

# Cookie Policy of Circlo

To find more information on California consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Virginia consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Colorado consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Connecticut consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Utah consumers and their privacy rights, Users may [read the privacy policy](#).

This document informs Users about the technologies that help this Application to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Application.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Application uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

## How this Application uses Trackers

### Necessary

This Application uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

### Functionality

This Application uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

### Trackers managed by third parties

#### Auth0 (Auth0, Inc)

Auth0 is a registration and authentication service provided by Auth0, Inc. To simplify the registration and authentication process, Auth0 can make use of third-party identity providers and save the information on its platform.

Personal Data processed: email address, first name, last name, password, picture, Trackers and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

#### Google OAuth (Google LLC)

Google OAuth is a registration and authentication service provided by Google LLC and is connected to the Google network.

Personal Data processed: Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

## Marketing

This Application uses Trackers to deliver personalized ads or marketing content, and to measure their performance.

### Trackers managed by third parties

#### Firebase Cloud Messaging (Google LLC)

Firebase Cloud Messaging is a message sending service provided by Google LLC. Firebase Cloud Messaging allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments.

Personal Data processed: Trackers and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

### How to manage preferences on this Application

Users can set or update their preferences via the relevant privacy choices panel available on this Application.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

### How to control or delete Cookies and similar technologies via your device settings

Users may use their own browser settings to:

- See what Cookies or other similar technologies have been set on the device;
- Block Cookies or similar technologies;
- Clear Cookies or similar technologies from the browser.

The browser settings, however, do not allow granular control of consent by category.

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#)
- [Microsoft Internet Explorer](#)
- [Microsoft Edge](#)
- [Brave](#)
- [Opera](#)

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

### How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by [YourOnlineChoices](#) (EU and UK), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

### Consequences of denying the use of Trackers

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help this Application to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

### Owner and Data Controller

Keizersgracht 391 A, 1016 EJ Amsterdam

**Owner contact email:** circloclub@gmail.com

Since the use of third-party Trackers through this Application cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Application.

## **Definitions and legal references**

### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

### **This Application**

The means by which the Personal Data of the User is collected and processed.

### **Service**

The service provided by this Application as described in the relative terms (if available) and on this site/application.

### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

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### **Legal information**

This policy has been prepared based on provisions of multiple legislations.

This policy relates solely to this Application, if not stated otherwise within this document.

Latest update: July 23, 2025