# Privacy Policy of www.sdi.com

This Application collects some Personal Data from its Users.

## Owner and Data Controller

SDI, Inc. 1414 Radcliffe Street, Ste 300, Bristol, PA 19007

**Owner contact email:** webmaster@sdi.com

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: email address; phone number; Usage Data; Trackers; first name; last name; company name; country; Data communicated in order to use the Service; physical address; state; ZIP/Postal code; city; number of Users; device information; session statistics; browser information; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; profession; website; Data communicated while using the service; province; county; latitude (of city); longitude (of city); metro area; geography/region; IP address; app information; device logs; operating systems; language; launches; number of sessions; session duration; scroll-to-page interactions; video views; browsing history; search history; page views; interaction events; page events; custom events; Application opens.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.
Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.
Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.
Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.
Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.
The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users’ consent.

# The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: User database management, Displaying content from external platforms, Contacting the User, Advertising, Analytics, SPAM protection, Interaction with external social networks and platforms, Platform services and hosting, Tag Management, Hosting and backend infrastructure, Interaction with live chat platforms and Traffic optimization and distribution.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

# Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

## Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, possibly based on User interests.
This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.
Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User’s interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.
Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

### Google Ad Manager (Google LLC)

Google Ad Manager is an advertising service provided by Google LLC that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with.
In order to understand Google's use of Data, consult Google's partner policy.
This service uses the “DoubleClick” Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

### Amazon Advertising (Amazon)

Amazon Advertising is an advertising service provided by Amazon.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

## Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

**Google Analytics (Universal Analytics) (Google LLC)**

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.
Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in the United States

**Google Analytics 4 (Google LLC)**

Google Analytics 4 is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.
Google may use the Data collected to contextualize and personalize the ads of its own advertising network.
In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: browser information; city; device information; number of Users; session statistics; Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

- a Sale in California

## Contacting the User

**Contact form (this Application)**

By filling in the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: city; company name; country; email address; first name; last name; phone number; physical address; state; ZIP/Postal code.

Category of Personal Information collected according to the CCPA: identifiers; commercial information.

This processing constitutes:

**Phone contact (this Application)**

Users that provided their phone number might be contacted for commercial or promotional purposes related to this Application, as well as for fulfilling support requests.

Personal Data processed: phone number.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

**Mailing list or newsletter (this Application)**

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data processed: city; company name; country; email address; first name; last name; phone number; physical address; profession; state; Trackers; Usage Data; website; ZIP/Postal code.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; employment related information.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana

## Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.
This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

**YouTube video widget (Google LLC)**

YouTube is a video content visualization service provided by Google LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California

**YouTube Data API (Google LLC)**

YouTube Data API is a video content visualization service provided by Google LLC that allows this Application to incorporate functions normally executed on YouTube so that Users can watch, find, and manage YouTube content directly on this Application.

Through this Service, this Application may collect Data directly or indirectly on or from Users' devices, including by making use of Trackers. Users may restrict such access to their Data via the security settings page provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the Network Advertising Initiative opt-out page.

Personal Data processed: Data communicated in order to use the Service.

Place of processing: United States – Privacy Policy – Opt out.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California

**Google Fonts (Google LLC)**

Google Fonts is a typeface visualization service provided by Google LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California

## Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable this Application to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Application.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### Microsoft Azure (Microsoft Corporation)

Microsoft Azure is a hosting service provided by Microsoft Corporation.

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

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sharing in California

## Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.
The interaction and information obtained through this Application are always subject to the User's privacy settings for each social network.
This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.
It is recommended to log out from the respective services in order to make sure that the processed data on this Application isn't being connected back to the User's profile.

### LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California

## Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Application, in order to contact and be contacted by this Application‘s support service.
If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

### HubSpot Chat (HubSpot, Inc.)

HubSpot Chat is a service for interacting with the HubSpot live chat platform provided by HubSpot, Inc.

Personal Data processed: email address.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sale in California
- a Sharing in California

## Platform services and hosting

These services have the purpose of hosting and running key components of this Application, therefore allowing the provision of this Application from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.
Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to build, run and host this Application.

Personal Data processed: Data communicated while using the service; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

### WP Engine (WPEngine, Inc.)

WP Engine is a hosting service provided by WPEngine, Inc.

Personal Data processed: Data communicated while using the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## SPAM protection

This type of service analyzes the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

### Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC.
The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information; inferences drawn from other personal information.

This processing constitutes:

### Cloudflare Bot Management (Cloudflare, Inc.)

Cloudflare Bot Management is a malicious bot protection and management service provided by Cloudflare, Inc.

Personal Data processed: app information; Application opens; browser information; browsing history; city; clicks; country; county; custom events; device information; device logs; geography/region; interaction events; IP address; keypress events; language; latitude (of city); launches; longitude (of city); metro area; motion sensor events; mouse movements; number of

sessions; operating systems; page events; page views; province; scroll position; scroll-to-page interactions; search history; session duration; session statistics; state; touch events; Trackers; Usage Data; video views; ZIP/Postal code.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information; geolocation data; inferences drawn from other personal information.

This processing constitutes:

- a Sharing in California

## Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralized fashion.
This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California

## Traffic optimization and distribution

This type of service allows this Application to distribute their content using servers located across different countries and to optimize their performance.
Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser.
Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

### Cloudflare (Cloudflare, Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.
The way Cloudflare is integrated means that it filters all the traffic through this Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

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

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers.

## User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Application, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Application.
Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Application.

### HubSpot CRM (HubSpot, Inc.)

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data processed: company name; country; email address; first name; last name; phone number; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

This processing constitutes:

- a Sale in California

**HubSpot Lead Management (HubSpot, Inc.)**

HubSpot Lead Management is a User database management service provided by HubSpot, Inc.

Personal Data processed: city; company name; email address; first name; last name; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

This processing constitutes:

- a Sale in California

**ZoomInfo (ZoomInfo Technologies LLC)**

ZoomInfo is a User database management platform with integrated tools for sales, marketing, and recruitment. It is provided by ZoomInfo Technologies LLC.

Personal Data processed: city; company name; email address; first name; last name; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

This processing constitutes:

- a Sale in the United States

# Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

# Cookie Policy

This Application uses Trackers. To learn more, Users may consult the Cookie Policy.

# Further Information for Users

## Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

### Details about the right to object to processing

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

# Further information for Users in the United States

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The information contained in this section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information.

## Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

*While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.*

- ▶

  ### Identifiers

- ▶

  ### Commercial information

- ▶

  ### Internet or other electronic network activity information

- ▶

  ### Inferences drawn from other personal information

- ▶

  ### Employment related information

- ▶

  ### Geolocation data

ℹ️ You can read the definitions of these concepts inside the “Definitions and legal references section” of the privacy policy.

**To know more about your rights in particular to opt out of certain processing activities you can refer to the “Your privacy rights under US state laws” section of our privacy policy.**

For more details on the collection of Personal Information, please read the section “Detailed information on the processing of Personal Data” of our privacy policy.

We won’t process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

## What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use this Application.

For example, you directly provide your Personal Information when you submit requests via any forms on this Application. You also provide Personal Information indirectly when you navigate this Application, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

## Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- **the right to request the deletion of your Personal Information.** You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.
- **the right to non-discrimination.**

**Additional rights for Users residing in California**

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- **The right to opt out of the Sharing of your Personal Information** for cross-context behavioral advertising;
- **The right to request to limit our use or disclosure of your Sensitive Personal Information** to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

**Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon and Montana**

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas and Oregon, you have

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- **The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

**Additional rights for users residing in Utah**

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah, you have

- **The right to opt out of** the processing of your Personal Information for **Targeted Advertising**;
- **The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

## How to exercise your privacy rights under US state laws

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

**How to exercise your rights to opt out**

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on this Application.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("GPC"), you are free to do so and we will abide by such request in a frictionless manner.

#### How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

# Additional information about Data collection and processing

## Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.
The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

## Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

## System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

## Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## Definitions and legal references

#### Personal Data (or Data) / Personal Information (or Information)

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.

#### Sensitive Personal Information

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

#### 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.

**Sale**

Sale means any exchange of Personal Information by the Owner to **a third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

**Sharing**

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioral advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

**Targeted advertising**

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer’s activities over time and across nonaffiliated websites or online applications to predict such consumer’s preferences or interests, as defined by the applicable privacy US state law.

**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.

**Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

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

Latest update: August 12, 2024