

# Cookie Policy of All apps owned by Plexagon s.r.l. and Refero s.a.

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.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.

## Activities strictly necessary for the operation of this Application and delivery of the Service

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.

### First-party Trackers

### Further information about Personal Data

#### localStorage (this Application)

localStorage allows this Application to store and access data right in the User's browser with no expiration date.

Personal Data processed: Tracker.

### Third-party Trackers

### Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

### RevenueCat (RevenueCat, Inc.)

RevenueCat is a payment service provided by RevenueCat, Inc. The service allows the Owner to monitor and analyze the User and their purchase history and can be used to keep track of User behavior.

Personal Data processed: Application opens, device information, Tracker, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), Usage Data and User ID.

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

### **Payments processed via the Apple App Store (Apple Inc.)**

This Application uses a payment service provided by Apple Inc. that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Apple, as described in the [privacy policy for the App Store](#).

Personal Data processed: billing address, device information, email address, first name, last name, password, payment info, phone number, purchase history, Tracker, Usage Data and username.

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

### **Payments processed via the Google Play Store (Google Ireland Limited)**

This Application uses a payment service provided by Google Ireland Limited that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Google, as described in the [privacy policy for the Google Play store](#).

Personal Data processed: billing address, device information, email address, first name, last name, payment info, phone number, purchase history, Tracker and Usage Data.

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

### **Stripe ( Stripe Technology Europe Ltd)**

Stripe is a payment service provided by Stripe Technology Europe Ltd.

Personal Data processed: billing address, email address, first name, last name, payment info, purchase history, Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

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

Storage duration:

- \_\_Host-LinkSession: 2 years
- \_\_stripe\_mid: 1 year
- \_\_stripe\_sid: 30 minutes
- dashboard.banner-dismissals: duration of the session
- link.auth\_session\_client\_secret: duration of the session
- m: 2 years
- pay\_sid: 1 year

### **Paddle**

Paddle is a payment management service provided by Paddle.com Market Limited or by Paddle Payments Limited, depending on how the Owner manages the Data processing, which allows Users to make online payments. Paddle also allows this Application to measure the performance of their checkout and subscriptions model, and to re-engage and message Users who have shown signs of abandonment.

Personal Data processed: billing address, contact info, contents of the email or message, email address, payment info, phone number, physical address, purchase history, Trackers, Usage Data and User ID.

Place of processing: United Kingdom – [Privacy Policy](#); Ireland – [Privacy Policy](#).

### **Other activities involving the use of Trackers**

### **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.

## Contacting the User

### 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, county, date of birth, email address, first name, gender, last name, phone number, physical address, profession, state, Trackers, Usage Data, website and ZIP/Postal code.

## Measurement

This Application uses Trackers to measure traffic and analyze User behavior to improve the Service.

### 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 (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited ("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.

Personal Data processed: Tracker and Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- AMP\_TOKEN: 1 hour
- \_ga: 2 years
- \_gac\*: 3 months
- \_gat: 1 minute
- \_gid: 1 day

#### Facebook Analytics for Apps (Facebook Ireland Ltd)

Facebook Analytics for Apps is an analytics service provided by Facebook Ireland Ltd

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

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

Storage duration:

- \_fbp: 3 months

#### Facebook Ads conversion tracking (Facebook pixel) (Facebook Ireland Ltd)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook Ireland Ltd that connects data from the Facebook advertising network with actions performed on this Application. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data processed: Tracker and Usage Data.

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

Storage duration:

- \_fbp: 3 months
- fr: 3 months

#### **Google Analytics for Firebase (Google Ireland Limited)**

Google Analytics for Firebase or Firebase Analytics is an analytics service provided by Google Ireland Limited.

**In order to understand Google's use of Data, consult [Google's partner policy](#).**

Firebase Analytics may share Data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. The User may check this privacy policy to find a detailed explanation about the other tools used by the Owner.

This Application uses identifiers for mobile devices and technologies similar to cookies to run the Firebase Analytics service.

Users may opt-out of certain Firebase features through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Firebase related sections of this privacy policy, if available.

Personal Data processed: Application opens, Application updates, device information, geography/region, In-app purchases, launches, number of sessions, number of Users, operating systems, session duration, Tracker, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and Usage Data.

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

#### **Marketing**

This Application uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads.

#### **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.

#### **Facebook Lookalike Audience (Facebook Ireland Ltd)**

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Facebook Ireland Ltd that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of this Application or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of Trackers for ads personalization by visiting this [opt-out page](#).

Personal Data processed: Tracker and Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- \_fbp: 3 months

#### **Adjust (Adjust GmbH)**

Adjust is an advertising service provided by Adjust GmbH.

Personal Data processed: Tracker and Usage Data.

Place of processing: Germany – [Privacy Policy](#) – [Opt out](#).

#### **AdMob (Google Ireland Limited)**

AdMob is an advertising service provided by Google Ireland Limited.

**In order to understand Google's use of Data, consult [Google's partner policy](#).**

Personal Data processed: Tracker, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and Usage Data.

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

Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- \_\_gads: 2 years
- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- \_gcl\_ha: 3 months
- id: 2 years
- test\_cookie: 15 minutes

### **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

#### **Mailchimp (Intuit Inc.)**

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: company name, country, Data communicated while using the service, date of birth, email address, first name, gender, last name, phone number, physical address, Trackers, Usage Data, username and various types of Data.

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

### **Remarketing and behavioral targeting**

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

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.

#### **Facebook Custom Audience (Facebook Ireland Ltd)**

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook Ireland Ltd that connects the activity of this Application with the Facebook advertising network.

Users can opt out of Facebook's use of Trackers for ads personalization by visiting this [opt-out page](#).

Personal Data processed: email address and Tracker.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- `_fbp`: 3 months

#### **Facebook Remarketing (Facebook Ireland Ltd)**

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook Ireland Ltd that connects the activity of this Application with the Facebook advertising network.

Personal Data processed: Tracker and Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- `_fbp`: 3 months

### **How to manage preferences and provide or withdraw consent**

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

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.

#### **Locating Tracker Settings**

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**

Plexagon s.r.l. – VAT Code IT07647380968 – Via Savona 94, Milano 20144

**Owner contact email:** support@clayeditor.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 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: April 12, 2023