Privacy Policy of www.iubenda.com

This Website collects some Personal Data from its Users.

Owner and Data Controller

iubenda s.r.l.
Via San Raffaele, 1 - 20121 Milan (Italy)
Milan Chamber of Commerce
EU VAT No: IT07347120961
UK VAT No: GB 370904694
SC: 12,795.78 Eur (fully paid up)
Legal Representative: Andrea Giannangelo

Data Protection Officer: dpo@iubenda.com
Owner contact email: info@iubenda.com

Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: email address; password; Data communicated while using the service; Trackers; Usage Data; first name; last name; various types of Data; IP address; invoicing information; Universally unique identifier (UUID); purchase history; device information; phone number; physical address; user subscriptions; page views; device logs; operating systems; browsing history; browser information; clicks; interaction events; scroll-to-page interactions; scroll position; crash data; number of Users; session statistics; contents of the email or message; language; current page; company name.

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 Website. Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website 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 Website or by the owners of third-party services used by this Website 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 Website.

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 Website (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: Contacting the User, Registration and authentication provided directly by this Website, Access to third-party accounts, Managing support and contact requests, Hosting and backend infrastructure, Remarketing and behavioral targeting, Traffic optimization and distribution, Advertising, Analytics, Infrastructure monitoring, Handling payments, Commercial affiliation, Data transfer outside the EU, Collection of privacy-related preferences, Interaction with live chat platforms, User database management, Interaction with data collection platforms and other third parties, Registration and authentication, Managing web conferencing and online telephony, Tag Management, Displaying content from external platforms, Managing contacts and sending messages, Connecting Data, Selling goods and services online, Internal processing tools, Content performance and features testing (A/B testing), Building and running this Website, Handling activities related to compliance and Heat mapping and session recording.

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”.

Facebook permissions asked by this Website

This Website may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows this Website to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the Facebook permissions documentation and to the Facebook privacy policy.

The permissions asked are the following:

**Basic information**

By default, this includes certain User’s Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

**device information**

**Email**

Provides access to the User's primary email address.

**Trackers**

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.

Detailed information on the processing of Personal Data

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

**Access to third-party accounts**

This type of service allows this Website to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorization by the User.

**Facebook account access (Meta Platforms, Inc.)**

This service allows this Website to connect with the User's account on the Facebook social network, provided by Meta Platforms, Inc.

Permissions asked: device information; Email; Trackers.
Legal basis for processing: Consent.

Place of processing: United States – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

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

**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 Website, 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 Website. For more information, please check the privacy policies of the relevant services. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

**Google Ads conversion tracking (Google Ireland Limited)**

Google Ads conversion tracking is an analytics service provided by Google Ireland Limited that connects data from the Google Ads advertising network with actions performed on this Website.

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

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: Ireland – Privacy Policy.

Legal basis for data transfer: No data transfer.

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

**Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)**

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on this Website. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.


Legal basis for data transfer: Standard data protection clauses.

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

**LinkedIn conversion tracking (LinkedIn Insight Tag) (LinkedIn Corporation)**

LinkedIn conversion tracking (LinkedIn Insight Tag) is an analytics and behavioral targeting service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on this Website. The LinkedIn Insight Tag tracks conversions that can be attributed to LinkedIn ads and enables to target groups of Users on the base of their past use of this Website.

Users may opt out of behavioral targeting features through their device settings, their LinkedIn account settings or by visiting the AdChoices opt-out page.

Personal Data processed: device information; Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: United States – Privacy Policy.
Legal basis for data transfer: Standard data protection clauses.

Data retention period: Keeping the data for the time necessary to fulfill the purpose.

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

**Impact (Impact Tech, Inc.)**

Impact is an advertising service provided by Impact Tech, Inc.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: United States – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

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

This processing constitutes:

**Landbot**

Advertising campaigns service used for interactive surveys, forms, conversational chatbots, landing pages and lead generation bots.

Legal basis for processing: Consent.

Legal basis for data transfer: Standard data protection clauses.

**LinkedIn Ads (LinkedIn Ireland Unlimited Company)**

LinkedIn Ads is an advertising service provided by LinkedIn Ireland Unlimited Company.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.


Legal basis for data transfer: Standard data protection clauses.

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

**Meta Lookalike Audience (Meta Platforms Ireland Limited)**

Meta Lookalike Audience is an advertising and behavioral targeting service provided by Meta Platforms Ireland Limited that uses Data collected through Meta's Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the basis of their past use of this Website or engagement with relevant content across Meta's apps and services. On the basis of these Data, personalized ads will be shown to Users suggested by Meta Lookalike Audience.

Users can opt out of Meta's use of Trackers for ads personalization by visiting this opt-out page.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.


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

**Microsoft Advertising (Microsoft Corporation)**
Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.


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

This processing constitutes:

**Google Ads Similar audiences (Google Ireland Limited)**

Similar audiences is an advertising and behavioral targeting service provided by Google Ireland Limited that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of this Website. On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don’t want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google Ad Settings.

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

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.


Legal basis for data transfer: Standard data protection clauses.

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

**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.

**Heap Analytics (Heap Inc.)**

Heap Analytics is an analytics service provided by Heap Inc, that allows the Owner to analyze revenue and Users’ (commercial) activity on this Website.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: United States – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

Data retention period: Keeping the data for the time necessary to fulfill the purpose.

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

**Matomo (self-hosted) (this Website)**

Matomo is an analytics software used by this Website to analyze data directly without the help of third parties.

Personal Data processed: IP address; Trackers; Usage Data.

Legal basis for processing: Consent.

Legal basis for data transfer: No data transfer.

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

**Google Analytics 4 (Google Ireland Limited)**
Google Analytics 4 is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of this Website, 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 their [partner policy](#) and their [Business Data page](#).

Personal Data processed: number of Users; session statistics; Trackers; Usage Data.

Legal basis for processing: Consent.


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

**Building and running this Website**

Key components of this Website are built and run directly by the Owner by making use of the software listed below.

**Swiftype - search bar (Elasticsearch BV)**

Swiftype is a search engine embedding service provided by Elasticsearch BV that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: Netherlands – [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

**Elev.io (Elevio Pty. Ltd.)**

The Elev.io is a service for interacting with the Elevio support and feedback platform provided by Elevio Pty. Ltd.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: Australia – [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

**Collection of privacy-related preferences**

This type of service allows this Website to collect and store Users’ preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

**iubenda Consent Database (iubenda srl)**

The iubenda Consent Database allows to store and retrieve records of Users’ consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent. In order to do so, it makes use of a Tracker that temporarily stores pending information on the User’s device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; IP address; Trackers.
Legal basis for processing: Legal obligation.

Place of processing: Italy – Privacy Policy.

Data retention period: Keeping the data for the duration of the contract (upon termination of the contract, if applicable, as long as required by the applicable law).

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

iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users’ preferences related to the processing of personal information, and in particular to the use of Cookies and other Trackers on this Website.

Personal Data processed: IP address; Trackers.

Legal basis for processing: Legal obligation.

Place of processing: Italy – Privacy Policy.

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

iubenda Newsletter Opt-in Booster (iubenda srl)

The iubenda Newsletter Opt-in Booster is a widget provided by iubenda s.r.l. for the collection of consent for email marketing. If the User freely decides to provide their email address via the widget, that consent is confirmed with a double opt-in email. Thereafter, the User's consent is recorded in the “iubenda Consent Database”.

If the User withdraws their consent for email marketing using the opt-out method provided by the Owner, the Owner will update this preference in the database.

Personal Data processed: current page; email address; IP address; language; Trackers.

Place of processing: Italy – Privacy Policy.

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

Commercial affiliation

This type of service allows this Website to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with this Website.

For details of which data are collected, please refer to the privacy policy of each service.

ReferralCandy (Anafore Pte. Ltd.)

ReferralCandy is a commercial affiliation service provided by Anafore Pte. Ltd.

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

Legal basis for processing: Consent.

Place of processing: Singapore – Privacy Policy.

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

This processing constitutes:

Admitad (Admitad GmbH)

Admitad is a commercial affiliation service provided by Admitad GmbH.

Personal Data processed: Trackers; Universally unique identifier (UUID); Usage Data.

Legal basis for processing: Consent.
Place of processing: Germany – Privacy Policy.
Legal basis for data transfer: Standard data protection clauses.
Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.
This processing constitutes:

**CJ Affiliate (Epsilon International UK Ltd (part of Publicis Groupe))**

CJ Affiliate is a commercial affiliation service provided by Epsilon International UK Ltd (part of Publicis Groupe).
Personal Data processed: purchase history; Trackers; Usage Data.
Legal basis for processing: Consent.
Place of processing: United Kingdom – Privacy Policy.
Legal basis for data transfer: Standard data protection clauses.
Category of Personal Information collected according to the CCPA: commercial information; internet or other electronic network activity information.
This processing constitutes:

**Connecting Data**

This type of service allows the Owner to connect Data with third-party services disclosed within this privacy policy. This results in Data flowing through these services, potentially causing the retention of this Data.

**Integromat (Integromat s.r.o.)**

Integromat is a workflow automation service provided by Integromat s.r.o. that automates the movement of Data between (third-party) services.
Personal Data processed: Data communicated while using the service.
Place of processing: Czech Republic – 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

**Contacting the User**

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

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 Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

Personal Data processed: email address.
Legal basis for processing: Consent.
Category of Personal Information collected according to the CCPA: identifiers.
This processing constitutes:

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

**Integration of Freshsales with Freshdesk Messaging and/or Freshdesk (Freshworks, Inc.)**

If a User provides their email address through the Freshdesk Messaging widget or a Freshdesk support ticket, the User's email address and other Data may be added to Freshsales, a customer relationship and contact management service (CRM). All services
The provision of the email address within Freshdesk is voluntary and serves the main purpose of being contacted for the fulfilling of requests related to support. In addition to making support requests easier to handle, the Owner can make use of the full range of the CRM features provided by Freshsales.

**Personal Data processed:** email address.

**Legal basis for processing:** Contract.

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

**Legal basis for data transfer:** Standard data protection clauses.

**Data retention period:** Keeping the data as long as necessary for the establishment, exercise or defense of legal claims.

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

**Phone number field**

By adding their phone number in the field available on the invoice page, the User will be contacted in case of billing issues related to the purchase of the solutions offered by iubenda. The phone number may also be used to provide support for the configuration of the solution purchased.

**Personal Data processed:** phone number.

**Legal basis for processing:** Contract.

**Content performance and features testing (A/B testing)**

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of this Website.

**GrowthBook Cloud (GrowthBook, Inc.)**

GrowthBook Cloud is an A/B testing service provided by GrowthBook, Inc.

**Personal Data processed:** browser information; browsing history; clicks; crash data; device information; device logs; interaction events; operating systems; page views; scroll position; scroll-to-page interactions; Trackers; Usage Data.

**Legal basis for processing:** Consent.

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

**Legal basis for data transfer:** Standard data protection clauses.

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

**Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction.

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.

**Wistia widget (Privacy Mode) (Wistia, Inc.)**

Wistia is a video content visualization service provided by Wistia, Inc. that allows this Website to incorporate content of this kind on its pages.

This widget is set up in a way that ensures that Wistia only collects fully anonymized viewing data about Users on this Website unless they opt in to being tracked.

**Personal Data processed:** 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.
**TrustBox widget (Trustpilot A/S)**

The TrustBox widget is a reviews and ratings service provided by Trustpilot A/S that allows this Website to incorporate that content on its pages.

Personal Data processed: clicks; page views; Trackers; Usage Data.

Legal basis for processing: Consent.

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

Legal basis for data transfer: No data transfer.

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

**Zapier widget (Zapier, Inc.)**

This Website embeds a widget provided by Zapier, Inc.

Personal Data processed: Usage Data.

Legal basis for processing: Consent.

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

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

**Handling activities related to compliance**

This type of service allows this Website to handle activities related to compliance.

**iubenda Whistleblowing Management Tool (iubenda srl)**

The iubenda Whistleblowing Management Tool allows for the processing, storage, and retrieval of Users' reports regarding wrongdoing or misconduct.

Personal Data processed: Data communicated while using the service; Usage Data.

Legal basis for processing: Legal obligation.

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

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

**Handling payments**

Unless otherwise specified, this Website 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 Website 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.

**PayPal (PayPal Inc.)**

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

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

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

Legal basis for data transfer: Binding corporate rules.

Data retention period: Keeping the data as long as required by relevant national law.
This processing constitutes:

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

**Braintree (PayPal (Europe) S.à.r.l. et Cie, S.C.A.)**

Braintree is a payment service provided by Braintree, a division of PayPal (Europe) S.à.r.l. et Cie, S.C.A.

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

Legal basis for processing: Contract.

Legal basis for data transfer: Standard data protection clauses.

Data retention period: Keeping the data as long as required by relevant national law.

**Retain by ProfitWell (200 OK LLC)**

Retain by ProfitWell is a payment service that follows up with Users when payments fail, provided by 200 OK LLC.

Personal Data processed: email address; phone number; physical address.

Legal basis for processing: Legitimate interest.

Legal basis for data transfer: Standard data protection clauses.

**Heat mapping and session recording**

Heat mapping services are used to display the areas of this Website that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior. Some of these services may record sessions and make them available for later visual playback.

**Matomo Heatmaps (InnoCraft)**

Matomo Heatmaps is a heat mapping service provided by InnoCraft.

Personal Data processed: clicks; interaction events; scroll position; Trackers; Usage Data.

Legal basis for processing: Consent.

Legal basis for data transfer: Standard data protection clauses.

**Hosting and backend infrastructure**

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

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.

**DigitalOcean (DigitalOcean Inc.)**

DigitalOcean is a hosting service provided by DigitalOcean Inc.
Personal Data processed: various types of Data as specified in the privacy policy of the service.

Legal basis for processing: Contract.

Place of processing: Netherlands – Privacy Policy; Germany – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

Data retention period: Keeping the data for the time necessary to fulfill the purpose.

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

Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

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

Legal basis for processing: Contract.

Place of processing: Ireland – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

Data retention period: Keeping the data for the time necessary to fulfill the purpose.

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

A-CUBE API (A-CUBE S.R.L)

A-CUBE API is a service provided by A-CUBE S.R.L that enables and facilitates the integration of this Website with the Italian Exchange System (ES) for the fulfillment of legal obligations. Personal Data are shared with A-CUBE API for the purpose of creating electronic invoices upon the fulfillment of a payment by the User.

Personal Data processed: invoicing information.

Legal basis for processing: Contract.

Place of processing: Italy – Privacy Policy.

Data retention period: Keeping the data for the time necessary to fulfill the purpose.

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

MongoDB Cloud (MongoDB, Inc.)

MongoDB Cloud is a hosting and backend service provided by MongoDB, Inc.

Personal Data processed: Usage Data.

Legal basis for processing: Contract.

Place of processing: Germany – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

Data retention period: Keeping the data for the time necessary to fulfill the purpose.

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

Infrastructure monitoring

This type of service allows this Website to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of this Website.

New Relic (New Relic, Inc.)
New Relic is a monitoring service provided by New Relic Inc. The way New Relic is integrated means that it filters all traffic of this Website, i.e., communication between the Application and the User's browser or device, while also allowing analytical data on this Website to be collected.

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

Legal basis for processing: Legitimate interest.

Place of processing: United States – Privacy Policy.

Legal basis for data transfer: Eu-u.s. data privacy framework.

Data retention period: Keeping the data as long as necessary for the establishment, exercise or defense of legal claims.

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

Sentry (Functional Software, Inc.)

Sentry is a monitoring service provided by Functional Software, Inc.

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

Legal basis for processing: Legitimate interest.

Place of processing: United States – Privacy Policy.

Legal basis for data transfer: Eu-u.s. data privacy framework.

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

Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Website for the purpose of saving and reusing data.

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.

Typeform widget (TYPEFORM S.L)

The Typeform widget is a service for interacting with the Typeform data collection platform provided by TYPEFORM S.L.

Personal Data processed: Data communicated while using the service; email address; Trackers.

Legal basis for processing: Consent.

Place of processing: Spain – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

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

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 Website, in order to contact and be contacted by this Website'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.

Freshdesk Messaging Widget (Freshworks, Inc.)

The Freshdesk Messaging Widget is a service for interacting with the Freshdesk live chat platform (Freshchat) provided by Freshworks, Inc.

Personal Data processed: Data communicated while using the service; email address; Trackers; Usage Data.

Legal basis for processing: Consent.
Internal processing tools

Radar

Radar is a proprietary tool of iubenda S.r.l. used for the periodic scanning service of its customers' websites to identify any compliance issues and notify the outcome by email.

Legal basis for processing: Contract.
Legal basis for data transfer: No data transfer.

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.

Vero (Vero Holdings Australia Pty. Ltd.)

Vero is an email address management and message sending service provided by Vero Holdings Australia Pty. Ltd.
Personal Data processed: email address; Trackers; Usage Data.
Place of processing: Australia – Privacy Policy.
Legal basis for data transfer: Standard data protection clauses.
Data retention period: Keeping the data for the time necessary to fulfill the purpose.
Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Twilio (Twilio, Inc.)

Twilio is a phone numbers management and communication service provided by Twilio, Inc.
Personal Data processed: phone number.
Place of processing: United States – Privacy Policy.
Legal basis for data transfer: Standard data protection clauses.
Category of Personal Information collected according to the CCPA: identifiers.

Appcues (Appcues, Inc.)

Appcues is a message sending service provided by Appcues, Inc. Appcues may also be used to manage the creation, deployment, administration, distribution and analysis of online forms and surveys.
Personal Data processed: email address; first name; Trackers; Usage Data.
Legal basis for processing: Consent.
Place of processing: United States – Privacy Policy.
Legal basis for data transfer: Standard data protection clauses.
Managing support and contact requests

This type of service allows this Website to manage support and contact requests received via email or by other means, such as the contact form.
The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

**Freshdesk (Freshworks, Inc.)**

Freshdesk is a support and contact request management service provided by Freshworks, Inc.

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

Legal basis for processing: Contract.

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

Legal basis for data transfer: Standard data protection clauses.

Data retention period: Keeping the data as long as necessary for the establishment, exercise or defense of legal claims.

Managing web conferencing and online telephony

This type of service allows this Website to manage the deployment, administration, hosting, recording, distribution and analysis of online telephony and web conferencing in order to communicate with Users.
The Personal Data collected depend on the information provided by the Users while using the respective service.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

**Livestorm (LIVESTORM SAS.)**

Livestorm is a web conferencing management service provided by LIVESTORM SAS.

Livestorm may use cookies to track User behavior. Users can find more information on how to opt out of Livestorm cookie tracking on this [page](#).

Personal Data processed: Data communicated while using the service; email address.

Legal basis for processing: Consent.

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

Legal basis for data transfer: Standard data protection clauses.

Data retention period: 3 years.
Registration and authentication

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Website will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Facebook Authentication (Meta Platforms, Inc.)

Facebook Authentication is a registration and authentication service provided by Meta Platforms, Inc. and is connected to the Facebook social network.

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

Legal basis for processing: Consent.

Place of processing: United States – Privacy Policy.

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

Google OAuth (Google Ireland Limited)

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

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

Legal basis for processing: Consent.

Place of processing: Ireland – Privacy Policy.

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

This processing constitutes:

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

Adherence to the Google API Services User Data Policy and Limited Use Requirements (this Website)

This Website’s use or transfer to other apps of information received from Google APIs will adhere to the Google API Services User Data Policy, including the Limited Use requirements.

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

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

Registration and authentication provided directly by this Website

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

Direct registration (this Website)

The User registers by filling out the registration form and providing the Personal Data directly to this Website.

Personal Data processed: email address; password.

Legal basis for processing: Consent.
Legal basis for data transfer: No data transfer.

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

**Remarketing and behavioral targeting**

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

**Google Ads Remarketing (Google Ireland Limited)**

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google Ireland Limited that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie.

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

Users can opt out of Google's use of Trackers for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.


Legal basis for data transfer: No data transfer.

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

This processing constitutes:

**Meta Custom Audience (Meta Platforms, Inc.)**

Meta Custom Audience is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of this Website with the Meta Audience Network.

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

Personal Data processed: email address; Trackers.

Legal basis for processing: Consent.


Legal basis for data transfer: Standard data protection clauses.

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

This processing constitutes:

**Facebook Remarketing (Meta Platforms, Inc.)**

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of this Website with the Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.


Legal basis for data transfer: Standard data protection clauses.
Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

**LinkedIn Website Retargeting (LinkedIn Corporation)**

LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of this Website with the LinkedIn advertising network.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.


Legal basis for data transfer: Standard data protection clauses.

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

This processing constitutes:

**Selling goods and services online**

This type of service helps the Owner to sell goods, provide services or monetize online content. To this end, the services listed below may for instance allow the Owner to process payments, set up subscription models, track orders, and manage deliveries.

**Chargebee (Chargebee Inc.)**

Chargebee is a subscription management tool provided by Chargebee Inc, which allows the Owner to manage subscriptions, invoicing, pricing models, and subscription and revenue analytics.

Personal Data processed: email address; first name; invoicing information; last name; phone number; user subscriptions.

Legal basis for processing: Contract.

Place of processing: United States – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

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

**Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Website 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 Ireland Limited)**

Google Tag Manager is a tag management service provided by Google Ireland Limited.

In order to understand Google's use of Data, consult their partner policy and their Business Data page.

Personal Data processed: Usage Data.

Place of processing: Ireland – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

Data retention period: 18 months.

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

**RudderStack (self-hosted) (this Website)**

RudderStack (self-hosted) is a tag management service used by this this Website.

Personal Data processed: Trackers; Usage Data.
Traffic optimization and distribution

This type of service allows this Website 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 Website 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.

Akamai Content Delivery Network (Akamai Technologies, Inc.)

Akamai Content Delivery Network is a traffic optimization and distribution service provided by Akamai Technologies, Inc.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Contract.

Place of processing: United States – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

Data retention period: Keeping the data for the time necessary to fulfill the purpose.

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

Bunny CDN (BunnyWay d.o.o.)

Bunny CDN is a traffic optimization and distribution service provided by BunnyWay d.o.o.

Personal Data processed: Usage Data.

Legal basis for processing: Contract.

Place of processing: Slovenia – Privacy Policy.

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

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 Website, 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 Website. 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 Website.

Freshsales (Freshworks, Inc.)

Freshsales is a User database management service provided by Freshworks, Inc.

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

Legal basis for processing: Contract.

Place of processing: United States – Privacy Policy.

Legal basis for data transfer: Standard data protection clauses.

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

Leadinfo (Leadinfo B.V.)
Leadinfo is a leads management service provided by Leadinfo B.V. that automatically identifies B2B qualified leads (i.e. businesses that have indicated an interest in becoming paying customers) and allows their management.

Personal Data processed: company name; email address; first name.

Legal basis for processing: Consent.

Place of processing: Netherlands – Privacy Policy.

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

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 Website 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 fulfill 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.

**Transfer of Personal Data outside of the European Union**

**Data transfer to countries that guarantee European standards**

If this is the condition for Data transfer, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission. The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission’s website.

**Data transfer abroad based on standard contractual clauses**

If this is the condition for Data transfer, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to “standard contractual clauses” provided by the European Commission. This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

**Further information for Users in Switzerland**

This section applies to Users in Switzerland, and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy.

Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the personal data, if any, the retention period and further information about Personal Data can be found in the section titled “Detailed information on the processing of Personal Data” within this document.

**The rights of Users according to the Swiss Federal Act on Data Protection**
Users may exercise certain rights regarding their Data within the limits of law, including the following:

- right of access to Personal Data;
- right to object to the processing of their Personal Data (which also allows Users to demand that processing of Personal Data be restricted, Personal Data be deleted or destroyed, specific disclosures of Personal Data to third parties be prohibited);
- right to receive their Personal Data and have it transferred to another controller (data portability);
- right to ask for incorrect Personal Data to be corrected.

**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, providing Users with the information required by law.

**Further information for Users in Brazil**

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

This section applies to all Users in Brazil (Users are referred to below, simply as “you”, “your”, “yours”), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term "personal information" as it is defined in the LGPD.

**The grounds on which we process your personal information**

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

**Categories of personal information processed**

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

**Why we process your personal information**

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

**Your Brazilian privacy rights, how to file a request and our response to your requests**

**Your Brazilian privacy rights**

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

**How to file your request**

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

**How and when we will respond to your request**

We will strive to promptly respond to your requests. In any case, should it be impossible for us to do so, we’ll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an access or personal information processing confirmation request, please make sure that you specify whether you’d like your personal information to be delivered in electronic or printed form. You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we’ll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a rectification, deletion, anonymization or personal information blocking request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

**Transfer of personal information outside of Brazil permitted by the law**

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

**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 Website 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 (and Sensitive 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**

  Personal Information collected or disclosed: Email address, Email, Trackers, Device information, Various types of data as specified in the privacy policy of the service, Data communicated while using the service, Usage data, First name, Last name, Various types of data, Universally unique identifier (uuid), Phone number, Physical address, Invoicing information, User subscriptions, Language, Ip address, Current page, Company name

  Sensitive Personal Information collected or disclosed: password, contents of the email or message

  Purposes:
  - Contacting the User
  - Registration and authentication provided directly by this Website
  - Access to third-party accounts
  - Managing support and contact requests
  - Hosting and backend infrastructure
  - Infrastructure monitoring
  - Handling payments
  - Commercial affiliation
  - Data transfer outside the EU
  - Remarketing and behavioral targeting
  - Interaction with live chat platforms
  - User database management
  - Interaction with data collection platforms and other third parties
  - Registration and authentication
  - Managing web conferencing and online telephony
  - Managing contacts and sending messages
  - Selling goods and services online
  - Collection of privacy-related preferences

  Retention period: keeping the Data as long as necessary for the establishment, exercise or defense of legal claims, keeping the Data for the time necessary to fulfill the purpose, keeping the Data as long as required by relevant national law, 3 years

  Sold or Shared: Yes

  Targeted Advertising: Yes

  Third-parties: This Website, PayPal Inc.


- **Internet or other electronic network activity information**

  Personal Information collected or disclosed: Email, Trackers, Device information, Various types of data as specified in the privacy policy of the service, Data communicated while using the service, Usage data, First name, Last name, Email address, Ip address, Universally unique identifier (uuid), Purchase history, Page views, Device logs, Operating systems, Browsing history, Browser information, Clicks, Interaction events, Scroll-to-page interactions, Scroll position, Crash data, Number of users, Session statistics, Language, Current page, Company name

  Sensitive Personal Information collected or disclosed: contents of the email or message

  Purposes:
  - Access to third-party accounts
  - Managing support and contact requests
- Remarketing and behavioral targeting
- Traffic optimization and distribution
- Advertising
- Analytics
- Infrastructure monitoring
- Handling payments
- Commercial affiliation
- Collection of privacy-related preferences
- Interaction with live chat platforms
- Interaction with data collection platforms and other third parties
- Registration and authentication
- Managing web conferencing and online telephony
- Tag Management
- Hosting and backend infrastructure
- Displaying content from external platforms
- Managing contacts and sending messages
- Connecting Data
- Content performance and features testing (A/B testing)
- Building and running this Website
- Handling activities related to compliance
- Heat mapping and session recording
- User database management

**Retention period:** keeping the Data as long as necessary for the establishment, exercise or defense of legal claims, keeping the Data for the time necessary to fulfill the purpose, keeping the Data as long as required by relevant national law, keeping the Data for the duration of the contract (upon termination of the contract, if applicable, as long as required by the applicable law), 3 years, 18 months

**Sold or Shared:** Yes

**Targeted Advertising:** Yes

**Third-parties:** This Website, PayPal Inc., Integromat s.r.o., Trustpilot A/S, Elasticsearch BV, Elevio Pty. Ltd., LinkedIn Ireland Unlimited Company


• **Commercial information**

**Personal Information collected or disclosed:** Invoicing information, Trackers, Usage data, Purchase history, Email address, First name, Last name, Phone number, User subscriptions, Company name

**Purposes:**

- Hosting and backend infrastructure
- Commercial affiliation
- Selling goods and services online
- User database management

**Retention period:** keeping the Data for the time necessary to fulfill the purpose

**Sold or Shared:** Yes

**Targeted Advertising:** Yes

**Service providers or contractors:** A-CUBE S.R.L, Epsilon International UK Ltd (part of Publicis Groupe), Chargebee Inc., Leadinfo B.V.

• **Inferences drawn from other personal information**

**Personal Information collected or disclosed:** Email address, Language, Trackers, Ip address, Current page

**Purposes:**

Collection of privacy-related preferences

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared:** Yes

**Targeted Advertising:** Yes

**Service providers or contractors:** iubenda srl

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 and to limit the use of your sensitive personal information (“Limit the Use of My Sensitive Personal Information”) 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 Website.

For example, you directly provide your Personal Information when you submit requests via any forms on this Website. You also provide Personal Information indirectly when you navigate this Website, 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 Website 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 Website.

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 Website 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 Website 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 Website and any third-party services may collect files that record interaction with this Website (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 Website 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.

Further information for Users in Brazil

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

This section applies to all Users in Brazil (Users are referred to below, simply as “you”, “your”, “yours”), according to the “Lei Geral de Proteção de Dados” (the “LGPD”), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal information” as it is defined in the LGPD.

The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

Categories of personal information processed

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

Why we process your personal information

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

Your Brazilian privacy rights, how to file a request and our response to your requests

Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;

obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;

revoke your consent at any time;

lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;

oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;

request clear and adequate information regarding the criteria and procedures used for an automated decision; and

request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

How and when we will respond to your request

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we’ll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an access or personal information processing confirmation request, please make sure that you specify whether you’d like your personal information to be delivered in electronic or printed form. You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead. In the latter case, we’ll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a rectification, deletion, anonymization or personal information blocking request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

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 Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, 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 Website 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 Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

This Website (or this Application)

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

Service

The service provided by this Website 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 Website, if not stated otherwise within this document.

Latest update: June 05, 2024