

# Privacy Policy of [www.xenialab.it](http://www.xenialab.it)

This Website collects some Personal Data from its Users.

## Owner and Data Controller

We inform you that the "Data Controller" of the processing is the Company XENIALAB S.r.l. (hereinafter, the "Data Controller"), with registered office in Paderno Dugnano (MI), via I Maggio 13, Italy, VAT no. IT09668910012. The following e-mail contact information is provided: [ufficio.privacy@ingogroup.it](mailto:ufficio.privacy@ingogroup.it). INGO Group, by which the Company XENIALAB S.r.l. is a wholly owned subsidiary, has appointed a Data Protection Officer (DPO): this is the figure in charge of overseeing that the regulations regarding the processing of personal data are observed and responding to your requests for clarification on how we process your data.

The DPO is also the figure appointed by the group to respond to your requests to exercise your right of access and other rights under the GDPR. You can contact him at the e-mail address listed: [alessandro@mcq.it](mailto:alessandro@mcq.it)

**Owner contact email:** [ufficio.privacy@ingogroup.it](mailto:ufficio.privacy@ingogroup.it)

## Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Trackers; city; ZIP/Postal code; state; province; country; county; latitude (of city); longitude (of city); metro area; geography/region; Usage Data; IP address; device information; app information; device logs; operating systems; browser information; language; launches; number of sessions; session duration; scroll-to-page interactions; mouse movements; scroll position; keypress events; motion sensor events; touch events; video views; clicks; browsing history; search history; session statistics; page views; interaction events; page events; custom events; Application opens; number of Users; email address; phone number; first name; last name; company name; physical address; time zone; diagnostic events; layout details; positional information; payment info; VAT Number; education history; job position; social media accounts ; user content; work history; Data communicated while using the service.

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 unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational 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

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

## 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: Traffic optimisation and distribution, Spam and bots protection, Analytics, Displaying content from external platforms, Tag Management, User database management, Remarketing and behavioural targeting, Heat mapping and session recording, Contacting the User, Managing contacts and sending messages, Handling payments, Managing data collection and online surveys, Advertising, Handling activities related to productivity, Connecting Data and Managing landing and invitation pages.

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

## Detailed information on the processing of Personal Data

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

### Advertising

This type of service allows User Data to be utilised 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 behavioural retargeting technique, i.e. displaying ads tailored to the User’s interests and behaviour, including those detected outside this Website. For more information, please check the privacy policies of the relevant services. Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section “How to opt-out of interest-based advertising” in this document.

### Direct Email Marketing (DEM) (this Website)

This Website uses the User Data to propose services and products provided by third parties or unrelated to the product or service provided by this Website.

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

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in the United States
- a Sharing in California

### Analytics

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

### 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 [Google's partner policy](#).

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

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

## **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.

### **Zapier (Zapier, Inc.)**

Zapier is a workflow automation service provided by Zapier, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: city; country; Data communicated while using the service; email address; first name; language; last name; phone number; Usage Data.

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

Category of Personal Information collected according to CCPA: identifiers; internet information; inferred information.

## **Contacting the User**

### **Contact form (this Website)**

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

Personal Data processed: company name; country; email address; first name; last name; phone number; physical address.

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

This processing constitutes:

- a Sale in California

### **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.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in the United States

### **Phone contact (this Website)**

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

Personal Data processed: phone number.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in California

## **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.  
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.

### **Google Fonts (Google Ireland Limited)**

Google Fonts is a typeface visualisation service provided by Google Ireland Limited that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

### **Handling activities related to productivity**

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

### **Human resources managed internally (this Website)**

This Website uses an internal human resources system that does not involve third parties.

Personal Data processed: city; education history; email address; first name; job position; last name; phone number; session statistics; social media accounts ; user content; work history.

Category of Personal Information collected according to CCPA: identifiers; internet 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.

### **Payment by bank transfer (this Website)**

In the event that the chosen payment method is a direct bank transfer to the current account indicated by this Website, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: company name; first name; last name; payment info; physical address.

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

### **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 analyse web traffic and keep track of User behaviour. Some of these services may record sessions and make them available for later visual playback.

### **Microsoft Clarity (Microsoft Corporation)**

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation. Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: clicks; country; custom events; device information; diagnostic events; interaction events; layout details; mouse movements; page events; positional information; scroll-to-page interactions; session duration; time zone; Trackers; Usage

Data.

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

Category of Personal Information collected according to CCPA: identifiers; internet information; geolocation data.

This processing constitutes:

- a Sale in California

## **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.

### **MailUp (Growens S.p.A.)**

MailUp is an email address management and message sending service provided by Growens S.p.A.

Personal Data processed: company name; country; email address; first name; last name; phone number; physical address.

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

## **Managing data collection and online surveys**

This type of service allows this Website to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

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.

### **JotForm (JotForm Inc.)**

JotForm is a form builder and data collection platform provided by JotForm Inc.

Personal Data processed: company name; country; email address; first name; last name; state; Usage Data; VAT Number.

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

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

This processing constitutes:

- a Sale in California

## **Managing landing and invitation pages**

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

### **Unbounce (Unbounce Marketing Solutions Inc.)**

Unbounce is a landing page management service provided by Unbounce Marketing Solutions Inc., that allows this Website to collect the email addresses of Users interested in its service.

Unbounce allows the Owner to track and analyse the User response concerning web traffic or behaviour regarding changes to the structure, text or any other component of the created landing pages.

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

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

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

## **Remarketing and behavioural targeting**

This type of service allows this Website and its partners to inform, optimise 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 behavioural 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.

### **LinkedIn Website Retargeting (LinkedIn Corporation)**

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

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

## **Spam and bots protection**

This type of service analyses the traffic of this Website, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognised as spam or protecting it from malicious bots activities.

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

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

Personal Data processed: app information; Application opens; browser information; browsing history; city; clicks; country; county; custom events; device information; device logs; geography/region; interaction events; IP address; keypress events; language; latitude (of city); launches; longitude (of city); metro area; motion sensor events; mouse movements; number of sessions; operating systems; page events; page views; province; scroll position; scroll-to-page interactions; search history; session duration; session statistics; state; touch events; Trackers; Usage Data; video views; ZIP/Postal code.

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

Category of Personal Information collected according to CCPA: identifiers; internet information; geolocation data; inferred information.

This processing constitutes:

- a Sharing in California

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Website in a centralised 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.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

## **Traffic optimisation and distribution**

This type of service allows this Website to distribute their content using servers located across different countries and to optimise 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.

### **Cloudflare (Cloudflare Inc.)**

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through this Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

Personal Data processed: Trackers.

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

Category of Personal Information collected according to CCPA: internet 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.

### **HubSpot CRM (HubSpot, Inc.)**

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

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

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

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

This processing constitutes:

- a Sale in California

## **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

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

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

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

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

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

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

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

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

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation 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.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

## Details about the right to object to processing

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

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



**Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

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

## **Further information for Users in the United States**

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this 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, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island 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.*

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

**Personal Information collected or disclosed:** Trackers, city, ZIP/Postal code, state, province, country, county, latitude (of city), longitude (of city), metro area, geography/region, Usage Data, IP address, device information, app information, device logs, operating systems, browser information, language, launches, number of sessions, session duration, scroll-to-page interactions, mouse movements, scroll position, keypress events, motion sensor events, touch events, video views, clicks, browsing history, search history, session statistics, page views, interaction events, page events, custom events, Application opens, number of Users, various types of Data as specified in the privacy policy of the service, email address, phone number, first name, last name, company name, physical address, time zone, diagnostic events, layout details, positional information, education history, job position, social media accounts, user content, work history, Data communicated while using the service

**Sensitive Personal Information collected or disclosed** ⓘ: VAT Number

#### **Purposes:**

- Traffic optimisation and distribution
- Spam and bots protection
- Analytics
- Displaying content from external platforms
- Tag Management
- User database management
- Remarketing and behavioural targeting
- Heat mapping and session recording
- Managing data collection and online surveys
- Handling activities related to productivity
- Connecting Data
- Managing landing and invitation pages

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

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Cloudflare Inc., Google Ireland Limited, HubSpot, Inc., LinkedIn Corporation, Microsoft Corporation, JotForm Inc., Zapier, Inc., Unbounce Marketing Solutions Inc.

**Service providers or contractors:** this Website

## Identifiers

**Personal Information collected or disclosed:** city, ZIP/Postal code, state, province, country, county, latitude (of city), longitude (of city), metro area, geography/region, Usage Data, Trackers, IP address, device information, app information, device logs, operating systems, browser information, language, launches, number of sessions, session duration, scroll-to-page interactions, mouse movements, scroll position, keypress events, motion sensor events, touch events, video views, clicks, browsing history, search history, session statistics, page views, interaction events, page events, custom events, Application opens, various types of Data as specified in the privacy policy of the service, email address, phone number, first name, last name, company name, physical address, time zone, diagnostic events, layout details, positional information, education history, job position, social media accounts, user content, work history, Data communicated while using the service

**Sensitive Personal Information collected or disclosed** ⓘ: payment info, VAT Number

### Purposes:

- Spam and bots protection
- User database management
- Heat mapping and session recording
- Contacting the User
- Managing contacts and sending messages
- Handling payments
- Managing data collection and online surveys
- Advertising
- Handling activities related to productivity
- Connecting Data
- Managing landing and invitation pages

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

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Cloudflare Inc., HubSpot, Inc., Microsoft Corporation, Growens S.p.A., JotForm Inc., Zapier, Inc., Unbounce Marketing Solutions Inc.

**Service providers or contractors:** this Website

## Geolocation data

**Personal Information collected or disclosed:** city, ZIP/Postal code, state, province, country, county, latitude (of city), longitude (of city), metro area, geography/region, Usage Data, Trackers, IP address, device information, app information, device logs, operating systems, browser information, language, launches, number of sessions, session duration, scroll-to-page interactions, mouse movements, scroll position, keypress events, motion sensor events, touch events, video views, clicks, browsing history, search history, session statistics, page views, interaction events, page events, custom events, Application opens, time zone, diagnostic events, layout details, positional information

### Purposes:

- Spam and bots protection
- Heat mapping and session recording

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

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Cloudflare Inc., Microsoft Corporation

## Inferences drawn from other personal information

**Personal Information collected or disclosed:** city, ZIP/Postal code, state, province, country, county, latitude (of city), longitude (of city), metro area, geography/region, Usage Data, Trackers, IP address, device information, app information, device logs,

operating systems, browser information, language, launches, number of sessions, session duration, scroll-to-page interactions, mouse movements, scroll position, keypress events, motion sensor events, touch events, video views, clicks, browsing history, search history, session statistics, page views, interaction events, page events, custom events, Application opens, first name, last name, email address, phone number, Data communicated while using the service

**Purposes:**

- Spam and bots protection
- Connecting Data

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


**Sold or Shared** : Yes

**Targeted Advertising:** : Yes

**Third-parties:** Cloudflare Inc., Zapier, Inc.

## Commercial information

**Personal Information collected or disclosed:** various types of Data as specified in the privacy policy of the service, email address, phone number, Usage Data, Trackers, first name, last name, company name, physical address, country, state

**Sensitive Personal Information collected or disclosed** : payment info, VAT Number

**Purposes:**

- User database management
- Contacting the User
- Managing contacts and sending messages
- Handling payments
- Managing data collection and online surveys

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

**Sold or Shared** : Yes

**Targeted Advertising:** : Yes

**Third-parties:** HubSpot, Inc., Growens S.p.A., JotForm Inc.

**Service providers or contractors:** this Website

 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, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island 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, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana 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. In Maryland, your Sensitive Personal Information will be collected or processed only if strictly necessary to provide or maintain a specific product or service requested by you.

In Minnesota and Maryland Users also have the right to obtain a list of the specific third parties to which the controller has disclosed the consumer's personal data

\* Note that in some states like Minnesota you have the following specific rights connected to profiling:

- The right to question the results of the profiling;
- The right to be informed of the reason that the profiling resulted in the decision; if feasible
- The right to be informed of what actions the consumer might have taken to secure a different decision and the actions that the consumer might take to secure a different decision in the future;
- The right to review personal data used in the profiling;
- If inaccurate, the right to have the data corrected and the profiling decision reevaluated based on the corrected data;

#### **Additional rights for users residing in Utah and Iowa**

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, 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.

### **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 utilised by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised 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 behavioural advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioural 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.

### **education history**

Provides access to education history.

### **work history**

Provides access to work history.

### **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: 31 October 2023