Privacy Policy of isendu

Isendu collects some Personal Data from its Users.

Owner and Data Controller

Isendu S.r.l. Via Luigi Casale, 7 05100 - Terni (TR)

Owner contact email: info@isendu.com

Types of Data collected

Among the types of Personal Data that isendu collects, by itself or through third parties, there are: first name; last name; phone number; email address; website; various types of Data; Trackers; Usage Data; device information; billing address; shipping address; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; number of Users; city; session statistics; latitude (of city); longitude (of city); browser information; 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 isendu. Unless specified otherwise, all Data requested by isendu is mandatory and failure to provide this Data may make it impossible for isendu to provide its services. In cases where isendu 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 isendu or by the owners of third-party services used by isendu 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 isendu.

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 isendu (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: Registration and authentication provided directly by isendu, Advertising, Contacting the User, Displaying content from external platforms, User database management, Tag Management, Infrastructure monitoring, Handling payments, Hosting and backend infrastructure, Platform services and hosting, Remarketing and behavioral targeting, Analytics, Interaction with live chat platforms, Interaction with external social networks and platforms, SPAM protection, Data transfer outside the EU, Managing data collection and online surveys, Collection of privacy-related preferences and Interaction with support and feedback platforms.

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

Detailed information on the processing of Personal Data

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

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on isendu, 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 for identifying Users, behavioral retargeting i.e. displaying ads tailored to the User's interests and behavior, or to measure ads performance. 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.

Meta ads conversion tracking (Meta pixel) (Meta Platforms Ireland Limited)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms Ireland Limited that connects data from the Meta Audience Network with actions performed on isendu. 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.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt out</u>.

Data retention period: Keeping the Data until consent is withdrawn.

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 isendu. 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 isendu.

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.

Data retention period: Keeping the Data until consent is withdrawn.

Quora Conversion Pixel (Quora, Inc.)

Quora Conversion Pixel is an analytics service provided by Quora, Inc. that connects data from the Quora Platform with actions performed on isendu.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

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

Data retention period: Keeping the Data until consent is withdrawn.

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.

HubSpot Analytics (HubSpot, Inc.)

HubSpot Analytics is an analytics service provided by HubSpot, Inc.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u> .

Data retention period: Keeping the Data until consent is withdrawn.

Capterra (Capterra Inc.)

Capterra's conversion tracking is a statistics and behavioural targeting service provided by Capterra Inc. that links data from the Capterra ad network with actions taken within isendu.

Personal data processed: Cookies; Usage Data.

Place of processing: United States - Privacy Policy.

Legal basis for processing: Consent.

Data retention period: Keeping the Data until consent is withdrawn.

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 isendu, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

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

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

Legal basis for processing: Consent.

Place of processing: Ireland – Privacy Policy – Opt Out.

Data retention period: Keeping the Data until consent is withdrawn.

Clarity (Microsoft Corporation)

Microsoft Clarity is a free analysis tool for websites. It helps is ensu to see the most popular pages on the website and how users click, scroll and interact with those pages.

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

Place of processing: See Microsoft's privacy policy - Privacy Policy.

Legal basis for processing: Consent.

Data retention period: Keeping the Data until consent is withdrawn.

Collection of privacy-related preferences

This type of service allows isendu 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; Trackers.

Legal basis for processing: Legal obligation.

Place of processing: Italy – Privacy Policy.

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

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 isendu.

Personal Data processed: Trackers.

Legal basis for processing: Legal obligation.

Place of processing: Italy – Privacy Policy.

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

Contacting the User

Mailing list or newsletter (isendu)

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

Personal Data processed: email address; first name.

Legal basis for processing: Consent.

Data retention period: Keeping the Data until consent is withdrawn.

Phone contact (isendu)

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

Personal Data processed: phone number.

Legal basis for processing: Consent.

Data retention period: Keeping the Data until consent is withdrawn.

Contact form (isendu)

By filling in the contact form with their Data, the User authorizes isendu 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: email address; first name; last name; phone number; various types of Data.

Legal basis for processing: Consent.

Data retention period: Keeping the Data until consent is withdrawn.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of isendu 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 visualization service provided by Google Ireland Limited that allows isendu to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Contract.

Place of processing: Ireland – <u>Privacy Policy</u>.

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).

Font Awesome (Fonticons, Inc.)

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows isendu to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Contract.

Place of processing: United States – <u>Privacy Policy</u>.

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).

Vimeo video (Vimeo, LLC)

Vimeo is a video content visualization service provided by Vimeo, LLC that allows isendu to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Contract.

Place of processing: United States – 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).

Spotify widget (Spotify AB)

Spotify is an audio content delivery service provided by Spotify AB that allows isendu to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: Sweden – <u>Privacy Policy</u>.

Data retention period: Keeping the Data until consent is withdrawn.

Handling payments

Unless otherwise specified, isendu 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. Isendu 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.

Stripe (Stripe Payments Europe, Limited)

Stripe is a payment service provided by Stripe Payments Europe, Limited.

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

Legal basis for processing: Contract.

Place of processing: European Union – <u>Privacy Policy</u>.

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).

Hosting and backend infrastructure

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

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.

Google Cloud Storage (Google Ireland Limited)

Google Cloud Storage is a hosting service provided by Google Ireland Limited.

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.

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).

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: Germany – 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).

Kinsta (Kinsta Inc.)

Kinsta is a cloud hosting service provided by Kinsta Inc.

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

Place of processing: United States - Privacy Policy.

Legal basis for processing: Contract.

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).

Infrastructure monitoring

This type of service allows isendu 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 isendu.

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: Contract.

Place of processing: United States - 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).

Interaction with external social networks and platforms

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

Facebook Like button and social widgets (Meta Platforms Ireland Limited)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms Ireland Limited

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: Ireland – Privacy Policy.

Data retention period: Keeping the Data until consent is withdrawn.

Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by X Corp.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: United States – Privacy Policy.

Data retention period: Keeping the Data until consent is withdrawn.

Tumblr sharing button and social widgets (Tumblr Inc.)

The Tumblr sharing button and social widgets are services allowing interaction with the Tumblr social network provided by Tumblr Inc.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: United States – <u>Privacy Policy</u>.

Data retention period: Keeping the Data until consent is withdrawn.

Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of isendu, in order to contact and be contacted by isendu's support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

HubSpot Live Chat (HubSpot Inc.)

HubSpot Live Chat, provided by HubSpot Inc., is an interaction service that allows isendu to provide assistance and support to the User.

Personal Data processed: various types of Data as specified by the service's privacy policy.

Place of processing: United States - Privacy Policy.

Legal basis for processing: Consent.

Data retention period: Keeping the Data until consent is withdrawn.

Interaction with support and feedback platforms

This type of service allows Users to interact with third-party support and feedback platforms directly from the pages of isendu. 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.

Trustpilot (Trustpilot A/S)

Trustpilot is a service provided by Trustpilot A/S that enables users to provide reviews of their shopping experiences on isendu.

Personal Data processed: name, email, various types of Data as specified by the privacy policy of the service.

Place of processing: Denmark - Privacy Policy.

Legal basis for processing: Consent.

Data retention period: Keeping the Data until consent is withdrawn.

Managing data collection and online surveys

This type of service allows isendu 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.

Typeform (TYPEFORM S.L)

Typeform is a form builder and data collection platform provided by TYPEFORM S.L.

Personal Data processed: email address; first name; Trackers; various types of Data as specified in the privacy policy of the service; website.

Legal basis for processing: Consent.

Place of processing: Spain – Privacy Policy.

Data retention period: Keeping the Data until consent is withdrawn.

Platform services and hosting

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

Shopify (Shopify International Limited)

Shopify is a platform provided by Shopify Inc. that allows the Owner to build, run and host an e-commerce website.

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

Legal basis for processing: Consent.

Place of processing: Ireland – Privacy Policy.

Data retention period: Keeping the Data until consent is withdrawn.

Registration and authentication provided directly by isendu

By registering or authenticating, Users allow isendu 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 (isendu)

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

Personal Data processed: email address; first name; last name; phone number; various types of Data; website.

Legal basis for processing: Contract.

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).

Remarketing and behavioral targeting

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

LinkedIn Website Retargeting (LinkedIn Corporation)

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

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

Data retention period: Keeping the Data until consent is withdrawn.

Reddit Pixel Retargeting (Reddit, Inc)

Reddit Pixel Retargeting is a remarketing and behavioral targeting service provided by Reddit that links isendu's activity with the Reddit advertising network.

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy.

Legal basis for processing: Consent.

Conditions for Data transfer: Standard data protection clauses.

Data retention period: Keeping the Data until consent is withdrawn.

SPAM protection

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

Google reCAPTCHA (Google Ireland Limited)

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited. The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.

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

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

Place of processing: Ireland – <u>Privacy Policy</u>.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on isendu 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.

Personal Data processed: Usage Data.

Place of processing: Ireland – Privacy Policy.

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 isendu, 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 isendu.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on isendu.

HubSpot CRM (HubSpot, Inc.)

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

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

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).

HubSpot Lead Management (HubSpot, Inc.)

HubSpot Lead Management is a User database management service provided by HubSpot, 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 – <u>Privacy Policy</u>.

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).

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.

Further information about the processing of Personal Data

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by isendu depends on the payment system used.

Cookie Policy

Isendu uses Trackers. To learn more, Users may consult the **Cookie Policy**.

Further Information for Users

Legal basis of processing

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

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

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

Further information about retention time

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

Therefore:

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

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

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

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

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

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

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.

- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

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

Details about the right to object to processing

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

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

How to exercise these rights

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

Transfer of Personal Data outside of the European Union

Data transfer abroad based on standard contractual clauses

If this is the legal basis, 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.

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 isendu 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, isendu 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, isendu and any third-party services may collect files that record interaction with isendu (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 isendu 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)

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

Usage Data

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

isendu (or this Application)

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

Service

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

European Union (or EU)

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

Cookie

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

Tracker

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

Legal information

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

Latest update: March 07, 2024