

# Privacy Policy of semactic.com

This Application collects some Personal Data from its Users.

## Owner and Data Controller

Semactic SRL  
VAT: BE0743670690  
Rue de l'industrie, 20  
1400 Nivelles  
Belgium

**Owner contact email:** [info@semactic.com](mailto:info@semactic.com)

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Trackers; Usage Data; session statistics; first name; last name; phone number; email address; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; device information; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

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

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent 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 Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

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

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

### Retention time

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

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, Contacting the User, Tag Management, Displaying content from external platforms, Advertising, Traffic optimisation and distribution, SPAM protection, Remarketing and behavioural targeting and Registration and authentication.

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 Application, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioural retargeting technique, i.e. displaying ads tailored to the User’s interests and behaviour, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

### LinkedIn Ads (LinkedIn Ireland Unlimited Company)

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

Personal Data processed: 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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

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

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

Users may opt out of behavioural 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.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

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

Personal Data processed: 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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

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

Google Analytics is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

Personal Data processed: 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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA

#### **Google Analytics with anonymised IP (Google Ireland Limited)**

Google Analytics is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualise and personalise the ads of its own advertising network. This integration of Google Analytics anonymises your IP address. It works by shortening Users’ IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: 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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

#### **MixPanel (MixPanel)**

MixPanel is an analytics service provided by Mixpanel Inc.

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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA

### **Google Analytics Demographics and Interests reports (Google Ireland Limited)**

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for this Application (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **Google Analytics Advertising Reporting Features (Google Ireland Limited)**

Google Analytics on this Application has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyse specific behaviour and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

## **Contacting the User**

### **Contact form (this Application)**

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

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

Category of personal information collected according to CCPA: identifiers.

This processing constitutes:

- a sale according to the CCPA and VCDPA

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

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

Google Fonts is a typeface visualisation service provided by Google Ireland Limited that allows this Application 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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **Google Maps widget (Google Ireland Limited)**

Google Maps is a maps visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **Gravatar (Automattic Inc.)**

Gravatar is an image visualisation service provided by Automattic Inc. that allows this Application to incorporate content of this kind on its pages.

Please note that if Gravatar images are used for comment forms, the commenter's email address or parts of it may be sent to Gravatar - even if the commenter has not signed up for that service.

Personal Data processed: email address; Usage Data.

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

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

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **YouTube IFrame Player (Google Ireland Limited)**

YouTube IFrame Player is a video content visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

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

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

Personal Data processed: Trackers.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the CPA, CTDPA and UCPA

## **Registration and authentication**

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

### **Google OAuth (Google Ireland Limited)**

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

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

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

Category of personal information collected according to CCPA: identifiers.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- a sharing according to the CCPA

### **LinkedIn OAuth (LinkedIn Corporation)**

LinkedIn OAuth is a registration and authentication service provided by LinkedIn Corporation and is connected to the LinkedIn social network.

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

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

### **Remarketing and behavioural targeting**

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

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and 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 Application 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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **SPAM protection**

This type of service analyses the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognised 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 [privacy policy](#) and [terms of use](#).

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 – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information; inferred information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **Tag Management**

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

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **Traffic optimisation and distribution**

This type of service allows this Application 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 Application and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

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

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

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

Personal Data processed: Trackers.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

## **Information on opting out of interest-based advertising**

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

## Cookie Policy

This Application uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## Further Information for Users

### Legal basis of processing

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

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

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

### Further information about retention time

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

Therefore:

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

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

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

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

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

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

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



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

### **Details about the right to object to processing**

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

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

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

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

## **Further information for California consumers**

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

This section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the state of California, United States of America, according to the "[California Consumer Privacy Act of 2018](#)" (the "CCPA"), as updated by the "California Privacy Rights Act" (the "CPRA") and subsequent regulations. For such consumers, this section supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term "personal information" as defined in the California Consumer Privacy Act (CCPA/CPRA).

### **Notice at collection**

#### **Categories of personal information collected, used, sold, or shared**

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. **You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.**

#### **Information we collect: the categories of personal information we collect**

We have collected the following categories of personal information about you: identifiers, internet or other electronic network activity information and inferences drawn from other personal information.

We do not collect sensitive personal information.

We will not collect additional categories of personal information without notifying you.

#### **What are the purposes for which we use your personal information?**

We may use your personal information to allow the operational functioning of this Application and features thereof ("business purposes"). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section "Detailed information on the processing of Personal Data" within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

#### **How long do we keep your personal information?**

Unless stated otherwise inside the "Detailed information on the processing of Personal Data" section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

#### **How we collect information: what are the sources of the personal information we collect?**

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

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

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

#### **How we use the information we collect: disclosing of your personal information with third parties for a business purpose**

For our purposes, the word "third party" means a person who is not any of the following: a service provider or a contractor, as defined by the CCPA.

We disclose your personal information with the third parties **listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

#### **Sale or sharing of your personal information**

For our purposes, the word "sale" means any "selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer's personal information by the business to a **third party, for monetary or other valuable consideration**", as defined by the CCPA.

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

For our purposes, the word "sharing" means any "sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged", as defined by the CCPA.

Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CCPA, does not constitute a sale or sharing of your personal information.

#### **Your right to opt out of the sale or sharing of your personal information and how you can exercise it**

We sell or share your personal information with the third parties **listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

You have the right to opt out of the sale or sharing of your personal information. This means that whenever you request us to stop selling or sharing your personal information, we will abide by your request.

Such requests can be made freely, at any time, without submitting any verifiable request.

To fully exercise your right to opt out, you can contact us at any time using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Application.

If you want to submit requests to opt out of the sale or sharing of personal information via a user-enabled global privacy control, like the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request in a frictionless manner (as defined in the CPRA regulations). The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a [participating browser](#) or browser extension. More information about downloading GPC is available [here](#).

We use any personal information collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

#### **What are the purposes for which we use your personal information?**

We may use your personal information to allow the operational functioning of this Application and features thereof (“business purposes”). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section “Detailed information on the processing of Personal Data” within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

#### **How long do we keep your personal information?**

Unless stated otherwise inside the “Detailed information on the processing of Personal Data” section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

### **Your privacy rights under the California Consumer Privacy Act and how to exercise them**

#### **The right to access personal information: the right to know and to portability**

You have the right to request that we disclose to you:

- the categories of personal information that we collect about you;
- the sources from which the personal information is collected;
- the purposes for which we use your information;
- to whom we disclose such information;
- the specific pieces of personal information we have collected about you.

You also have **the right to know what personal information is sold or shared and to whom**. In particular, you have the right to request two separate lists from us where we disclose:

- the categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared;
- the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance — provided that this is technically feasible.

#### **The right to request the deletion of your personal information**

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on this Application, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and notify any of our service providers and all third parties to whom we have sold or shared the personal information to do so — provided that this is technically feasible and doesn’t involve disproportionate effort.

#### **The right to correct inaccurate personal information**

You have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

#### **The right to opt out of sale or sharing of personal information and to limit the use of your sensitive personal information**

You have the right to opt out of the sale or sharing of your personal information. You also have the right to request that we limit our use or disclosure of your sensitive personal information.

#### **The right of no retaliation following opt-out or exercise of other rights (the right to non-discrimination)**

We will not discriminate against you for exercising your rights under the CCPA. This means that we will not discriminate against you, including, but not limited to, by denying goods or services, charging you a different price, or providing a different level or quality of goods or services just because you exercised your consumer privacy rights.

However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction.

To the extent permitted by the law, we may offer you promotions, discounts, and other deals in exchange for collecting, keeping, or selling your personal information, provided that the financial incentive offered is reasonably related to the value of your personal information.

### **How to exercise your rights**

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

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will use any personal information collected from you in connection with the verification of your request solely for the purposes of 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 cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

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

You can submit a maximum number of 2 requests over a period of 12 months.

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

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period. Only with regard to personal information collected on or after January 1, 2022, you have the right to request that we disclose information beyond the 12-month period, and we will provide them to you unless doing so proves impossible or would involve a disproportionate effort.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. 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 it.

## **Further information for Virginia consumers**

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

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the Commonwealth of Virginia, according to the [“Virginia Consumer Data Protection Act”](#) (the “VCDPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the VCDPA.

## **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers, internet information and inferred information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

### **Why we process your personal data**

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

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a natural or legal person, public authority, agency, or body other than the consumer, controller, processor, or an affiliate of the processor or the controller" as defined by the VCDPA.

### **Sale of your personal data**

For our purposes, the word “sale” means any “exchange of personal data for monetary consideration by us to a third party” as defined by the VCDPA.

Please note that according to the VCDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the VCDPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal information may be considered a sale under VCDPA.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

For our purposes, the word "targeted advertising" means "displaying advertisements to you where the advertisement is selected based on personal data obtained from your activities over time and across nonaffiliated websites or online applications to predict your preferences or interests" as defined by the VCDPA.

Please note that according to the VCDPA, targeted advertising does not include: “advertisements based on activities within a controller's own websites or online applications; advertisements based on the context of a consumer's current search query, visit to a website or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely for measuring or reporting advertising performance, reach, or frequency”.

To find out more details on the processing of your personal data for targeted advertising purposes, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

## **Your privacy rights under the Virginia Consumer Data Protection Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- **access personal data: the right to know.** You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- **correct inaccurate personal data.** You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- **request the deletion of your personal data.** You have the right to request that we delete any of your personal data.
- **obtain a copy of your personal data.** We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity — provided that this is technically feasible.
- **opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **non-discrimination.** We will not discriminate against you for exercising your rights under the VCDPA. This means that we will not, among other things, deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your consumer privacy rights. However, if you refuse to provide your personal data to us or ask us to delete or stop selling your personal data, and that personal data or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction. To the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if you have exercised your right to opt out, or our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

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 need to know who you are.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

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

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

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 60 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to two requests per year. If your request is manifestly unfounded, excessive or repetitive, 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.

## **Further information for Colorado consumers**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes

of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Colorado, according to the “Colorado Privacy Act” (the “CPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the CPA.

## **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers, internet information and inferred information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

### **Why we process your personal data**

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

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CPA.

### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CPA.

Please note that according to the CPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Application.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CPA.

Please note that according to the CPA, targeted advertising does not include: “advertisements directed to a consumer in response to the consumer's request for information or feedback; advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; or processing personal data solely to measure or report advertising frequency, performance or reach”.

#### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Application.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

#### **Universal opt-out mechanism: Global privacy control**

If you want to submit requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

#### **Your privacy rights under the Colorado Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

#### **How to exercise your rights**

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 need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.



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

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

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to two requests per year.

## **Further information for Connecticut consumers**

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

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Connecticut, according to “An Act Concerning Personal Data Privacy and Online Monitoring ” (also known as “The Connecticut Data Privacy Act” or the “CTDPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the CTDPA.

### **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

#### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers, internet information and inferred information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

#### **Why we process your personal data**

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

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

#### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CTDPA.

#### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CTDPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CTDPA.

Please note that according to the CTDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CTDPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

#### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Application.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

#### **Processing of your personal data for targeted advertising**

As specified in the "Detailed information on the processing of Personal Data" section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across non affiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CTDPA.

Please note that according to the CTDPA, targeted advertising does not include: "advertisements based on activities within a controller's own web sites or online applications; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely to measure or report advertising frequency, performance or reach".

#### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Application.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

#### **Universal opt-out mechanism: Global privacy control**

If you want to submit requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

#### **Your privacy rights under the Connecticut Data Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

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 need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

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

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

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to one request per year.

## **Further information for Utah consumers**

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

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Utah, according to the “Consumer Privacy Act” (the “UCPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the UCPA.

### **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document.**

#### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers, internet information and inferred information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

#### **Why we process your personal data**

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

### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person other than: the consumer, controller, or processor; or an affiliate or contractor of the controller or the processor" as defined by the UCPA.

### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the UCPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the UCPA.

Please note that according to the UCPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the UCPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Application.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by UCPA.

Please note that according to the UCPA, targeted advertising does not include: “advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to a web site or online application; advertisements directed to a consumer in response to the consumer's request for information, product, a service or feedback; or processing personal data solely to measure or report advertising performance, reach or frequency.”

### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Application.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

### **Your privacy rights under the Utah Consumer Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising or the sale of personal data.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

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 need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request. We may retain your email address to respond to your request.

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

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

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request.

We do not charge a fee to respond to your request, for up to one request per year.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

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

### **System logs and maintenance**

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

### **Information not contained in this policy**

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

### **Changes to this privacy policy**

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

the bottom.

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

## **Definitions and legal references**

### **Personal Data (or Data)**

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

### **Usage Data**

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilised by the Users who use this Application, 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 Application who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

### **This Application**

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

### **Service**

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

### **European Union (or EU)**

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

### **Cookie**

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

### **Tracker**

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

**Legal information**

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

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

Latest update: 8 March 2024