# **Cookie Policy of Convertain**

To find more information on California consumers and their privacy rights, Users may read the privacy policy.

To find more information on Virginia consumers and their privacy rights, Users may read the privacy policy.

To find more information on Colorado consumers and their privacy rights, Users may read the privacy policy.

To find more information on Connecticut consumers and their privacy rights, Users may read the privacy policy.

To find more information on Utah consumers and their privacy rights, Users may read the privacy policy.

This document informs Users about the technologies that help this Website to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Website.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent, depending on the applicable law. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Website uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

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

This Website uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

### **Third-party Trackers**

# **SPAM** protection

This type of service analyzes the traffic of this Website, 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 reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

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, Tracker and Usage Data.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Storage duration:

- \_GRECAPTCHA: duration of the session
- rc::a: indefinite
- rc::b: duration of the session
- rc::c: duration of the session

# Further information about Personal Data

#### iubenda Cookie Solution (consent Cookie) (iubenda srl)

iubenda consent Cookie (\_iub\_cs-X) is set by the iubenda Cookie Solution and stores User preferences related to Trackers in the local domain.

Personal Data processed: Tracker.

Place of processing: Italy - Privacy Policy.

Storage duration:

- \_iub\_cs-\*: 1 year
- usprivacy: 1 year

# Handling payments

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

#### Stripe

Stripe is a payment service provided by Stripe Inc, Stripe Technology Europe Ltd or by Stripe Payments Ltd, depending on how the Owner manages the Data processing.

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

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy; United Kingdom - Privacy Policy.

Storage duration:

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

# Traffic optimization and distribution

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

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser.

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

#### Cloudflare (Cloudflare, Inc.)

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

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

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

Place of processing: United States - Privacy Policy.

# Other activities involving the use of Trackers

# Functionality

This Website uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

#### 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 this Website.

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.

#### Zendesk Widget (Zendesk, Inc.)

The Zendesk Widget is a service for interacting with the Zendesk support and feedback platform provided by Zendesk Inc.

Personal Data processed: company name, email address, first name, last name, Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

- ZD-bannerDismissed: duration of the session
- ZD-campaigns: duration of the session
- ZD-conversationStartedAt: duration of the session

#### User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Website, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Website. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Website.

#### ActiveCampaign (ActiveCampaign, Inc.)

ActiveCampaign is a User database management service provided by ActiveCampaign, Inc.

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

Place of processing: United States – Privacy Policy.

Storage duration:

• ac\_enable\_tracking: 1 month

#### Measurement

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

#### Analytics

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

#### Meta ads conversion tracking (Meta pixel)

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

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt out; Ireland - Privacy Policy - Opt out.

Storage duration:

- \_fbp: 3 months
- fr: 3 months

#### Meta Events Manager

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited or by Meta Platforms, Inc., depending on how the Owner manages the Data processing. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on this Website.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland - Privacy Policy - Opt out; United States - Privacy Policy - Opt out.

Storage duration:

• \_fbp: 3 months

#### Twitter Ads conversion tracking (X Corp.)

Twitter Ads conversion tracking is an analytics service provided by X Corp. that connects data from the Twitter advertising network with actions performed on this Website.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

• personalization\_id: 2 years

#### TikTok conversion tracking

TikTok conversion tracking is an analytics and behavioral targeting service provided by TikTok Inc., TikTok Information Technologies UK Limited or by TikTok Technology Limited, depending on how the Owner manages the Data processing, that connects data from the TikTok advertising network with actions performed on this Website. The TikTok pixel tracks conversions that can be attributed to TikTok ads and enables to target groups of Users on the base of their past use of this Website.

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

Place of processing: United States - Privacy Policy; United Kingdom - Privacy Policy; Ireland - Privacy Policy.

#### Pinterest Conversion Tag (Pinterest, Inc.)

Pinterest Conversion Tag is an analytics service provided by Pinterest, Inc. that connects data from the Pinterest advertising network with actions performed on this Website.

Users may opt out of behavioral advertising features through their device settings, their Pinterest <u>personalization settings</u> or by visiting the <u>AdChoices opt-out page</u>.

Personal Data processed: device information, Trackers and Usage Data.

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

Storage duration:

- \_pin\_unauth: 1 year
- \_pinterest\_ct\_ua: duration of the session

#### Google Ads conversion tracking

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on this Website.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Storage duration:

- IDE: 2 years
- test cookie: 15 minutes

#### **Google Analytics 4**

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting <u>Google's official documentation</u>.

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

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

- \_ga: 2 years
- \_ga\_\*: 2 years

# Marketing

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

#### Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Website, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Website. For more information, please check the privacy policies of the relevant services.

Services of this kind usually 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 Lookalike Audience

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

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

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt out; Ireland - Privacy Policy - Opt out.

Storage duration:

• \_fbp: 3 months

#### Remarketing and behavioral targeting

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

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

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

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of

the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### **Facebook Remarketing**

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Website with the Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

• \_fbp: 3 months

#### Meta Custom Audience

Meta Custom Audience is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Website with the Meta Audience Network.

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

Personal Data processed: email address and Trackers.

Place of processing: United States - Privacy Policy - Opt out; Ireland - Privacy Policy - Opt out.

Storage duration:

• \_fbp: 3 months

# How to manage preferences and provide or withdraw consent

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

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

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

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

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

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

#### **Locating Tracker Settings**

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- <u>Google Chrome</u>
- Mozilla Firefox
- <u>Apple Safari</u>
- <u>Microsoft Internet Explorer</u>
- <u>Microsoft Edge</u>
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

#### How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by <u>YourOnlineChoices</u> (EU and UK), the <u>Network</u> <u>Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

#### Consequences of denying the use of Trackers

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help this Website to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

#### **Owner and Data Controller**

#### **Convertain Limited**

Room 606, 6/F, Hollywood Centre 77-91 Queen's Road West Sheung Wan, HongKong

#### Owner contact email: support@convertain.com

Since the use of third-party Trackers through this Website cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Website.

# **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 Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

#### **Data Subject**

The natural person to whom the Personal Data refers.

# **Data Processor (or Processor)**

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

# Data Controller (or Owner)

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

#### This Website (or this Application)

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

#### Service

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

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

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

#### Cookie

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

#### Tracker

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

#### Legal information

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

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

Latest update: September 20, 2023