# **Privacy Policy of Mudithara**

This Website collects some Personal Data from its Users.

## Owner and Data Controller

Akileas di Rizzi Valentina via dei Cappuccini 3 c int 11 38062 Arco (TN) P.IVA 02700160225

Owner contact email: info@mudithara.com

# **Types of Data collected**

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Usage Data; Trackers; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; first name; last name; phone number; physical address; country; county; email address; ZIP/Postal code; various types of Data; city; purchase history; billing address; shipping address; device information; Data communicated in order to use the Service; date of birth; username; password; state; User ID; house number; prefix; IP address; number of Users; session statistics; Data communicated while using the service; payment info; identification document; data relating to the point of sale; page views; province; geography/region; contents of the email or message; in-app purchases; invoicing information; customer support; order ID; product interaction.

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

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website. Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies – or of other tracking tools — by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

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

# Mode and place of processing the Data

# Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

#### **Place**

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

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

#### Retention time

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

# The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Spam and bots protection, Infrastructure monitoring, Contacting the User, Content commenting, Displaying content from external platforms, Handling payments, Platform services and hosting, Advertising, Analytics, Registration and authentication provided directly by this Website, Remarketing and behavioral targeting, Registration and authentication, Interaction with external social networks and platforms, Collection of privacy-related preferences, Content performance and features testing (A/B testing), Interaction with live chat platforms, Managing contacts and sending messages, Tag Management and Hosting and backend infrastructure.

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

# **Detailed information on the processing of Personal Data**

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

# Advertising

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

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

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

Personal Data processed: Trackers; Usage Data.

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

# Meta Lookalike Audience (Meta Platforms Ireland Limited)

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

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

Personal Data processed: Trackers; Usage Data.

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

#### VisitIQ (DrivenIQ Corporation)

VisitIQ is an advertising service provided by DrivenIQ Corporation.

Personal Data processed: Trackers; Usage Data.

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

# Google Ads conversion tracking (Google Ireland Limited)

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

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

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

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

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

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

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

Personal Data processed: Trackers; Usage Data.

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

## Google Search Ads 360 (Google Ireland Limited)

Google Search Ads 360 is an advertising service provided by Google Ireland Limited that allows the Owner to manage and plan search advertising campaigns. This includes displaying ads to the right targeted audience, bidding through automated decision-making tools (called "automated bidding") and measuring the campaign's performance. Users may decide to disable the ad personalization Trackers by going to: <u>Google Ad Settings</u>.

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

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

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

# **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 Events Manager (Meta Platforms Ireland Limited)

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. 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; Usage Data.

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

#### **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

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

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

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

## **Collection of privacy-related preferences**

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

#### iubenda Privacy Controls and Cookie Solution (iubenda srl)

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

Personal Data processed: IP address; Trackers.

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

# **Contacting the User**

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

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

Personal Data processed: city; country; country; email address; first name; last name; phone number; physical address; various types of Data; ZIP/Postal code.

# Mailing list or newsletter (this Website)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

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

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

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

Personal Data processed: phone number.

# **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of this Website. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments. If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

### **Facebook Comments (Meta Platforms Ireland Limited)**

Facebook Comments is a content commenting service provided by Meta Platforms Ireland Limited enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Trackers; Usage Data.

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

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

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

# **Visual Website Optimizer (Wingify)**

Visual Website Optimizer is an A/B testing service provided by Wingify Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

#### **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### **Instagram widget (Meta Platforms Ireland Limited)**

Instagram is an image visualization service provided by Meta Platforms Ireland Limited that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

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

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

Personal Data processed: Trackers; Usage Data.

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

#### GitHub button and social widgets (GitHub Inc.)

The GitHub button and social widgets are services allowing interaction with the GitHub and Gist services provided by GitHub, Inc.

Personal Data processed: Usage Data.

Place of processing: United States – Privacy Policy.

#### YouTube Data API (Google Ireland Limited)

YouTube Data API is a video content visualization service provided by Google Ireland Limited that allows this Website to incorporate functions normally executed on YouTube so that Users can watch, find, and manage YouTube content directly on this Website.

Through this Service, this Website 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 <u>security settings page</u> 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 <u>Network Advertising Initiative opt-out page</u>.

Personal Data processed: Data communicated while using the service; device information; Trackers; Usage Data; User ID; username.

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

#### Google Programmable Search Engine (Google Ireland Limited)

Google Programmable Search Engine is a search engine embedding service provided by Google Ireland Limited that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

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

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

Through this Service, this Website 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 <u>security settings page</u> 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 <u>Network Advertising Initiative opt-out page</u>.

Personal Data processed: Data communicated in order to use the Service.

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

#### TrustBox widget (Trustpilot A/S)

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

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

Place of processing: Denmark – Privacy Policy.

## **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.

#### Apple Pay (Apple Inc.)

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: billing address; email address; first name; last name; phone number; purchase history; shipping address; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

#### Google Pay (Google Ireland Limited)

Google Pay is a payment service provided by Google Ireland Limited, which allows users to make online payments using their Google credentials.

Personal Data processed: billing address; email address; first name; last name; phone number; purchase history; shipping address; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

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

#### PayPal (PayPal Inc.)

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

Personal Data processed: billing address; data relating to the point of sale; device information; email address; first name; identification document; last name; password; payment info; phone number; purchase history; Trackers; Usage Data; username; various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – <u>Privacy Policy</u>.

## **Shop Pay (Shopify International Limited)**

Shop Pay is a payment management and product checkout page service provided by Shopify International Limited which allows Users to make online payments on this Website.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; purchase history; shipping address; Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

#### Visa (Visa Inc.)

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

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; product interaction; shipping address; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

#### American Express (American Express Company)

American Express is a payment service provided by American Express Company which allows Users to make online payments.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; product interaction; shipping address; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

#### Mastercard (Mastercard Inc.)

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

Personal Data processed: billing address; email address; first name; last name; payment info; product interaction; purchase history; shipping address; Usage Data.

Place of processing: United States – Privacy Policy.

#### **Union Pay**

Union Pay è un servizio di pagamento fornito da UnionPay Chinese Bank, che consente all'Utente di effettuare pagamenti online. Dati Personali trattati: cognome, nome, cronologia acquisti, Dati di utilizzo, dati relativi al punto vendita, documento di identità, email, indirizzo di fatturazione, informazioni di pagamento, informazioni sul dispositivo, nome, numero di telefono, password, Strumenti di Tracciamento, username e varie tipologie di Dati secondo quanto specificato dalla privacy policy del servizio.

Luogo del trattamento: Consulta la privacy policy di https://b2b.unionpayintl.com/epsp-portal/en/i/privacyPolicy.html

# Hosting and backend infrastructure

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

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

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

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

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

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

#### **Infrastructure monitoring**

This type of service allows this Website to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved. Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of this Website.

#### Sentry (Functional Software, Inc. )

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

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

Place of processing: United States - Privacy Policy.

#### **Bugsnag (Bugsnag Inc.)**

Bugsnag is a monitoring service provided by Bugsnag Inc.

Personal Data processed: country; date of birth; email address; first name; last name; username; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

## **Interaction with external social networks and platforms**

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

# PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: See the PayPal privacy policy – <u>Privacy Policy</u>.

#### YouTube button and social widgets (Google Ireland Limited)

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google Ireland Limited.

Personal Data processed: Usage Data.

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

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

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

Personal Data processed: Trackers; Usage Data.

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

# **Interaction with live chat platforms**

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Website, in order to contact and be contacted by this Website's support service. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

#### **Shopify Chat (Shopify International Limited)**

Shopify Chat is a service for interacting with the Shopify live chat platform provided by Shopify International Limited.

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

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

## Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User. These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

# Trustpilot Automatic Feedback Service (Trustpilot A/S)

The Trustpilot Automatic Feedback Service is a message-sending service provided by Trustpilot A/S that automates the sending of email requests for product or service reviews based on specific Users' actions performed on this Website.

Personal Data processed: city; contents of the email or message; customer support; email address; first name; geography/region; in-app purchases; invoicing information; last name; order ID; phone number; province; purchase history; shipping address;

Trackers; ZIP/Postal code.

Place of processing: Denmark – Privacy Policy.

# Platform services and hosting

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

# **Shopify (Shopify International Limited)**

Shopify is a platform provided by Shopify International Limited that allows the Owner to build, run and host an e-commerce website. This service may place Trackers on the User's device. For the most up-to-date and comprehensive information, refer to the service's official documentation.

Personal Data processed: billing address; device information; email address; first name; last name; phone number; shipping address; Trackers; Usage Data.

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

## **Registration and authentication**

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

#### **Direct registration and profiling (this Website)**

By registering or authenticating directly through this Website, Users allow this Website to identify them and give them access to dedicated services. The Owner may process Data collected when Users register or authenticate also for targeting and profiling purposes; to find out more, Users can contact the Owner using the contact details provided in this document.

Personal Data processed: country; county; email address; first name; house number; last name; password; phone number; prefix; shipping address; state; User ID; ZIP/Postal code.

# Registration and authentication provided directly by this Website

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

#### **Direct registration (this Website)**

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

Personal Data processed: city; country; country; email address; first name; house number; last name; password; phone number; physical address; state; User ID; ZIP/Postal code.

# 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 allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

#### **Meta Custom Audience (Meta Platforms Ireland Limited)**

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

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

Personal Data processed: email address; Trackers.

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

# Google Ads Remarketing (Google Ireland Limited)

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

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

Users can opt out of Google's use of Trackers for ads personalization by visiting Google's Ads Settings.

Personal Data processed: Trackers; Usage Data.

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

# **Spam and bots protection**

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

#### Google reCAPTCHA (Google Ireland Limited)

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

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

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

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

#### hCaptcha (Intuition Machines, Inc)

hCaptcha is a SPAM protection service provided by Intuition Machines, Inc.

Personal Data processed: Data communicated in order to use the Service; Trackers.

Place of processing: United States – Privacy Policy.

# **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Website in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

#### **Google Tag Manager (Google Ireland Limited)**

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

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

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

# Information on opting out of interest-based advertising

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

# Further information about the processing of Personal Data

#### "Do Not Track"

Because there is no legal or industry consensus yet on how "Do Not Track" signals should be recognized or honored, this Website does not support "Do Not Track" requests at this time. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

# Selling goods and services online

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

# **Cookie Policy**

This Website uses Trackers. To learn more, Users may consult the Cookie Policy.

# **Further Information for Users**

# Legal basis of processing

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

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

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

# Further information about retention time

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

#### Therefore:

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

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to 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.

# Additional information about Data collection and processing

## Legal action

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

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

# Additional information about User's Personal Data

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

#### System logs and maintenance

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

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

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

# Changes to this privacy policy

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

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

## **Definitions and legal references**

#### Personal Data (or Data)

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

Latest update: July 28, 2025