Privacy Policy of Doozy

Doozy collects some Personal Data from its Users.

Owner and Data Controller

Doozy Live Ltd 128 City Road London EC1V 2NX United Kingdom

EU Representative

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Owner contact email: privacy@doozy.live

Types of Data collected

Among the types of Personal Data that Doozy collects, by itself or through third parties, there are: first name; last name; phone number; email address; username; profile picture; social media accounts; Usage Data; payment info; billing address; Trackers; Universally unique identifier (UUID); Data communicated while using the service; various types of Data; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events.

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 Doozy. Unless specified otherwise, all Data requested by Doozy is mandatory and failure to provide this Data may make it impossible for Doozy to provide its services. In cases where Doozy 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 Doozy or by the owners of third-party services used by Doozy 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 Doozy.

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

Place

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

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

Retention time

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

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Registration and authentication, Hosting and backend infrastructure, Infrastructure monitoring, Handling payments, Analytics, User database management, Productivity, Communication, Data transfer outside of the UK, Social features, Data transfer outside the EU, SPAM protection and Remarketing and behavioural targeting.

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:

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.

MixPanel (MixPanel)

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana
- · a Sharing in California

Communication

Daily.co

Video / Audio Conferencing

Personal Data processed: User names, call data

United States - Privacy Policy

Handling payments

Unless otherwise specified, Doozy 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. Doozy isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

Stripe (Stripe Payments Ltd)

Stripe is a payment service provided by Stripe Payments Ltd.

Personal Data processed: billing address; email address; first name; last name; payment info.

Place of processing: United Kingdom – Privacy Policy.

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

Hosting and backend infrastructure

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

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.

Firebase Cloud Firestore (Google LLC)

Firebase Cloud Firestore is a hosting and backend service provided by Google LLC.

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

Place of processing: United Kingdom – Privacy Policy.

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

Algolia (Algolia SAS)

Algolia is a hosting and backend service provided by Algolia SAS.

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

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

Category of Personal Information collected according to CCPA: identifiers.

Vercel (Vercel Inc)

Vercel is a hosting service provided by Vercel Inc

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

Place of processing: United States – Privacy Policy

Firebase Realtime Database (Google Ireland Limited)

Firebase Realtime Database is a hosting and backend service provided by Google Ireland Limited.

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

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

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

Firebase Cloud Functions (Google LLC)

Firebase Cloud Functions is a hosting and backend service provided by Google LLC.

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

Place of processing: United Kingdom – <u>Privacy Policy</u>; Belgium – <u>Privacy Policy</u>.

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

Google Cloud Storage (Google LLC)

Google Cloud Storage is a hosting service provided by Google LLC.

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

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

Category of Personal Information collected according to CCPA: identifiers.

Infrastructure monitoring

This type of service allows Doozy to monitor the use and behaviour 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 Doozy.

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 – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

Productivity

Slack (Slack Technologies, LLC)

Information about members of your workspace including their name, email address, profile photo and other profile information will be shared with us.

The information we will collect allows us to:

- Provide a list of your workspace members to invite to join Doozy
- Display your upcoming Doozy events within Slack
- Allow us to link existing Doozy members in your team to their associated Slack users
- Interact with Doozy activities such as Quizzes and Icebreakers directly in Slack within channels
- Enable signing into Doozy from Slack, without needing to re-authenticate
- Enable teammates to invite you to rooms and events directly from Doozy

On disconnecting your Slack workspace from Doozy, information relating to your workspace and data stored/cached in Doozy will be removed from our systems.

Google Calendar

- We will have access to your calendar events and calendar names
- We will be able to create and update events in your calendar
- We will only store data on our system relating to the events you've created and updated in Doozy
- We will only make changes to your calendar events that were created in Doozy
- On disconnecting your calendar from Doozy, your access tokens will be revoked, and all information related to your calendar will be removed from our systems.

Merge (Merge API Inc)

Doozy uses Merge to securely connect to your HRIS systems and sync key data to our platform.

Employee data including Avatar, Company, Date Of Birth (Optional), Employment Status, First Name, Last Name, Manager, Start Date, Team, Termination Date, work email.

Company data including Display Name and Legal Name

Group + team data including Names and members

You will be notified if the data we sync changes in the future, and will be able to opt out of this.

The information we will collect allows us to provide your team with enhanced Doozy features such as celebration notifications to managers and new hire notifications.

On disconnecting your HRIS system from Doozy, data synchronised including employees, groups and teams are deleted from our system within 14 days.

You can find more information about Merge here https://merge.dev/legal/privacy-policy

Registration and authentication

By registering or authenticating, Users allow Doozy 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, Doozy 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.

Firebase Authentication

Firebase Authentication is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. To simplify the registration and authentication process, Firebase Authentication can make use of third-party identity providers and save the information on its platform.

Personal Data processed: email address; first name; last name; phone number; profile picture; social media accounts; username.

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

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

Sign in with Apple (Apple Inc.)

Sign in with Apple is a registration and authentication service provided by Apple Inc. In cases where Users are required to provide their email address, Sign in with Apple may generate a private relay address on behalf of Users that automatically forwards messages to their verified personal email account - therefore shielding their actual email address from the Owner.

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

Place of processing: United States - Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers.

Google OAuth

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, 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: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana
- a Sharing in California

Remarketing and behavioural targeting

This type of service allows Doozy and its partners to inform, optimise and serve advertising based on past use of Doozy 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 Doozy with the LinkedIn advertising network.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

Social features

Giphy

Embedding gifs

Privacy Policy

SPAM protection

This type of service analyses the traffic of Doozy, 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 LLC)

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

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

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

Place of processing: United States – Privacy Policy.

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

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Doozy, 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 Doozy.

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

Intercom

Intercom is a User database management service provided by Intercom Inc. or by Intercom Software UK Limited, depending on how the Owner manages the Data processing.

Intercom can also be used as a medium for communications, either through email, or through messages within Doozy. Intercom Messenger may use Trackers to recognise and track Users behaviour.

Personal Data processed: Data communicated while using the service; email address; Trackers; Universally unique identifier (UUID); Usage Data; various types of Data as specified in the privacy policy of the service.

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

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

This processing constitutes:

• a Sharing in California

Information on opting out of interest-based advertising

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

Further information about the processing of Personal Data

Selling goods and services online

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

Cookie Policy

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

Further Information for Users

Legal basis of processing

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

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

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

Further information about retention time

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

Therefore:

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

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

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

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

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

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

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

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

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

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

Details about the right to object to processing

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

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

How to exercise these rights

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

Transfer of Personal Data outside of the European Union

Data transfer to countries that guarantee European standards

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

Transfer of Personal Data outside of the United Kingdom

Data transfers according to a UK adequacy regulation

If this is the legal basis, the transfer of Personal Data from the UK to third countries may take place according to a so called "adequacy regulation" of the UK Government.

The UK Government adopts adequacy regulations for specific countries or territories whenever such countries or territories guarantee Personal Data protection standards comparable to those set forth by UK data protection legislation. Users can find an updated list of all adequacy regulations on the website of the Information Commissioner's Office (ICO).

Further information for Users in the United States

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

The information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.

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Identifiers

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Audio, electronic, visual, thermal, olfactory, or similar information

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Internet or other electronic network activity information

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Commercial information

• •

Inferences drawn from other personal information

i You can read the definitions of these concepts inside the "Definitions and legal references section" of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information ("Limit the Use of My Sensitive Personal Information") you can refer to the "Your privacy rights under US state laws" section of our privacy policy.

For more details on the collection of Personal Information, please read the section "<u>Detailed information on the processing of Personal Data</u>" of our privacy policy.

We won't process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use Doozy.

For example, you directly provide your Personal Information when you submit requests via any forms on Doozy. You also provide Personal Information indirectly when you navigate Doozy, 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 Doozy and features thereof.

Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- the right to request the deletion of your Personal Information. You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.

• the right to non-discrimination.

Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- The right to opt out of the Sharing of your Personal Information for cross-context behavioral advertising;
- The right to request to limit our use or disclosure of your Sensitive Personal Information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas and Oregon, you have

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.

 Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

Additional rights for users residing in Utah

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah, you have

- The right to opt out of the processing of your Personal Information for Targeted Advertising;
- The right to opt out of the processing of your Sensitive Personal Information. Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

How to exercise your privacy rights under US state laws

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

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

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

How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on Doozy.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("<u>GPC</u>"), you are free to do so and we will abide by such request in a frictionless manner.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Doozy 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, Doozy 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, Doozy and any third-party services may collect files that record interaction with Doozy (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 Doozy and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

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

Definitions and legal references

Personal Data (or Data) / Personal Information (or Information)

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

Sensitive Personal Information

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

Usage Data

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

Doozy (or this Application)

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

Service

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

Sale

Sale means any exchange of Personal Information by the Owner to **a third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

Sharing

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioural advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioural advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

Targeted advertising

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

European Union (or EU)

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

Cookie

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

Tracker

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

Legal information

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

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

Latest update: 12 September 2024