# Cookie Policy of www.xcally.com

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 www.xcally.com 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 www.xcally.com.

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. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Www.xcally.com 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 www.xcally.com and delivery of the Service

Www.xcally.com 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**

# Tag Management

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

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

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

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Consent.

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

# Traffic optimisation and distribution

This type of service allows www.xcally.com to distribute their content using servers located across different countries and to optimise their performance.

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

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

#### Cloudflare (Cloudflare Inc.)

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

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

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

Legal basis for processing: Consent.

Place of processing: United States – Privacy Policy.

# Spam and bots protection

This type of service analyses the traffic of www.xcally.com, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognised as spam or protecting it from malicious bots activities.

#### Cloudflare Bot Management (Cloudflare Inc.)

Cloudflare Bot Management is a malicious bot protection and management service provided by Cloudflare Inc.

Personal Data processed: app information, Application opens, browser information, browsing history, city, clicks, country, county, custom events, device information, device logs, geography/region, interaction events, IP address, keypress events, language, latitude (of city), launches, longitude (of city), metro area, motion sensor events, mouse movements, number of sessions, operating systems, page events, page views, province, scroll position, scroll-to-page interactions, search history, session duration, session statistics, state, touch events, Trackers, Usage Data, video views and ZIP/Postal code.

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

Storage duration:

• \_\_cf\_bm: 3 seconds

• cfruid: duration of the session

cf\_ob\_info: 3 secondscf\_use\_ob: 3 secondscfmrk\_cic: 3 months

# Google reCAPTCHA (Google Ireland Limited)

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

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

Legal basis for processing: Consent.

Place of processing: 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

# Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

# **Unbounce (Unbounce Marketing Solutions Inc.)**

Unbounce is a landing page management service provided by Unbounce Marketing Solutions Inc., that allows www.xcally.com to collect the email addresses of Users interested in its service.

Unbounce allows the Owner to track and analyse the User response concerning web traffic or behaviour regarding changes to the structure, text or any other component of the created landing pages.

Personal Data processed: email address, Trackers and Usage Data.

Legal basis for processing: Consent.

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

# Other activities involving the use of Trackers

# **Functionality**

Www.xcally.com 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.

#### **Contacting the User**

#### Contact form (www.xcally.com)

By filling in the contact form with their Data, the User authorises www.xcally.com 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: company name, country, date of birth, email address, field of activity, first name, last name, phone number, physical address, profession, state, Trackers, User ID and various types of Data.

Legal basis for processing: Consent.

# 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 www.xcally.com, 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 www.xcally.com.

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

# HubSpot CRM (HubSpot, Inc.)

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

Personal Data processed: company name, country, email address, first name, last name, phone number, physical address, profession, Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

Legal basis for processing: Consent.

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

# Storage duration:

hs\_gpc\_banner\_dismiss: 6 months

• hssc: 30 minutes

• hssrc: duration of the session

hstc: 2 months
hubspotutk: 2 months
messagesUtk: 2 months

# **Experience**

Www.xcally.com uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

# Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of www.xcally.com 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.

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

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

Through this Service, www.xcally.com 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, Data communicated while using the service and Trackers.

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

#### YouTube video widget (Google Ireland Limited)

YouTube is a video content visualisation service provided by Google Ireland Limited that allows www.xcally.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Consent.

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

Storage duration:

• PREF: 8 months

VISITOR\_INFO1\_LIVE: 8 monthsYSC: duration of the session

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

Google Fonts is a typeface visualisation service provided by Google Ireland Limited that allows www.xcally.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

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

#### Measurement

Www.xcally.com uses Trackers to measure traffic and analyse User behaviour to improve the Service.

#### **Analytics**

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

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

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of www.xcally.com, 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

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: number of Users, session statistics, Trackers and Usage Data.

Legal basis for processing: Consent.

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

#### Storage duration:

- \_ga: 2 years
- ga \*: 2 years

#### 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 www.xcally.com.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Consent.

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

Storage duration:

• \_fbp: 3 months

#### Matomo Cloud (InnoCraft)

Matomo Cloud is an analytics service provided by InnoCraft.

Personal Data processed: geography/region, interaction events, IP address, session duration, time zone, Trackers and Usage Data.

Legal basis for processing: Explicit consent.

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

# ShinyStat (ShinyStat S.p.a. (SevenData S.p.a.))

ShinyStat (ShinyStat Business, ShinyStat Pro or ShinySta ISP) is an analytics service provided by ShinyStat S.p.a. (SevenData S.p.a.).

This analytics service anonymises the User's IP address.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- SN \*: 6 months
- SSA: indefinite
- SSC\_\*: 6 months
- SSID \*: duration of the session
- SV \*: duration of the session

# Heat mapping and session recording

Heat mapping services are used to display the areas of www.xcally.com that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyse web traffic and keep track of User behaviour.

Some of these services may record sessions and make them available for later visual playback.

# **Microsoft Clarity (Microsoft Corporation)**

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation.

Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: mouse movements and Trackers.

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

Storage duration:

• ANONCHK: 10 minutes

CLID: 1 yearMR: 7 daysMUID: 1 year

• SM: duration of the session

\_clck: 1 year\_clsk: 1 day

# Managing data collection and online surveys

This type of service allows www.xcally.com to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

#### JotForm (JotForm Inc.)

JotForm is a form builder and data collection platform provided by JotForm Inc.

Personal Data processed: company name, country, email address, first name, last name, phone number, state, Trackers, Usage Data and website.

Legal basis for processing: Consent.

Place of processing: Germany – Privacy Policy.

# **Marketing**

Www.xcally.com uses Trackers to deliver personalised marketing content based on User behaviour and to operate, serve and track ads.

#### Advertising

This type of service allows User Data to be utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on www.xcally.com, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers for identifying Users, behavioural retargeting i.e. displaying ads tailored to the User's interests and behaviour, or to measure ads performance. For more information, please check the privacy policies of the relevant services.

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

#### 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 www.xcally.com.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Consent.

Place of processing: Ireland – Privacy Policy.

Storage duration:

• IDE: 2 years

• test cookie: 15 minutes

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

Similar audiences is an advertising and behavioural targeting service provided by Google Ireland Limited that uses Data from Google Ads Remarketing in order to display ads to Users with similar behaviour to Users who are already on the remarketing list due to their past use of www.xcally.com.

On the basis of this Data, personalised 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 Ad Settings.

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

Personal Data processed: Trackers and Usage Data.

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

#### Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- \_\_gads: 2 years
- \_\_gsas: 2 years
- gac: 3 months
- gac gb: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- gcl ha: 3 months
- id: 2 years
- test\_cookie: 15 minutes

#### 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 www.xcally.com. 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.

Legal basis for processing: Consent.

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

#### Storage duration:

- \_fbp: 3 months
- fr: 3 months

#### **Analytics**

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

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

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of www.xcally.com, 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

In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

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

Legal basis for processing: Consent.

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

Storage duration:

\_ga: 2 yearsga \*: 2 years

#### 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 www.xcally.com.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Consent.

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

Storage duration:

• \_fbp: 3 months

#### Matomo Cloud (InnoCraft)

Matomo Cloud is an analytics service provided by InnoCraft.

Personal Data processed: geography/region, interaction events, IP address, session duration, time zone, Trackers and Usage Data.

Legal basis for processing: Explicit consent.

Place of processing: New Zealand – Privacy Policy.

#### ShinyStat (ShinyStat S.p.a. (SevenData S.p.a.))

ShinyStat (ShinyStat Business, ShinyStat Pro or ShinySta ISP) is an analytics service provided by ShinyStat S.p.a. (SevenData S.p.a.).

This analytics service anonymises the User's IP address.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- SN \*: 6 months
- SSA: indefinite
- SSC \*: 6 months
- SSID \*: duration of the session
- SV\_\*: duration of the session

# 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.

#### MailUp (Growens S.p.A.)

MailUp is an email address management and message sending service provided by Growens S.p.A.

Personal Data processed: company name, country, email address, first name, last name, phone number, physical address, profession, Trackers and Usage Data.

Legal basis for processing: Consent.

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

#### Remarketing and behavioural targeting

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

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Explicit consent.

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

#### Storage duration:

• AnalyticsSyncHistory: 1 month

• JSESSIONID: duration of the session

• UserMatchHistory: 1 month

bcookie: 1 yearbscookie: 1 year

• lang: duration of the session

lide: 1 daylisse: 1 yearlms\_ads: 1 monthlms\_analytics: 1 month

# Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioural targeting service provided by Google Ireland Limited that connects the activity of www.xcally.com 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 personalisation by visiting Google's Ads Settings.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Explicit consent.

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

# Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
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- RUL: 1 year
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- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- gcl gb: 3 months
- \_gcl\_gf: 3 months
- gcl\_ha: 3 months
- id: 2 years
- test\_cookie: 15 minutes

#### Facebook Remarketing (Meta Platforms Ireland Limited)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms Ireland Limited that connects the activity of www.xcally.com with the Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Explicit consent.

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

Storage duration:

• fbp: 3 months

#### Remarketing with Google Analytics (Google Ireland Limited)

Remarketing with Google Analytics is a remarketing and behavioural targeting service provided by Google Ireland Limited that connects the tracking activity performed by Google Analytics and its Trackers with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Explicit consent.

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

Storage duration:

• test cookie: 15 minutes

IDE: 2 years\_gcl\_\*: 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:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- 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 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 www.xcally.com 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**

Xcally S.r.l. con sede in Via I Maggio 13 - 20037 Paderno Dugnano (MI), Italy; VAT number IT09668910012. Puoi contattarci per ottenere informazioni e/o per l'esercizio dei tuoi diritti all'indirizzo e-mail: ufficio.privacy@technesy.it Responsabile della Protezione dei Dati (DPO): è la figura incaricata di sorvegliare che sia osservata la normativa in materia di trattamento dei dati personali e di rispondere alle tue richieste di chiarimento su come trattiamo i tuoi dati. Il DPO è anche la figura incaricata dalla società di rispondere alle tue richieste per l'esercizio del diritto di accesso e degli altri diritti previsti dal GDPR. Puoi contattarlo all'indirizzo e-mail indicato: alessandro@mcq.it

# Owner contact email: ufficio.privacy@technesy.it

Since the use of third-party Trackers through www.xcally.com 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 www.xcally.com.

# **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 www.xcally.com (or third-party services employed in www.xcally.com), which can include: the IP addresses or domain names of the computers utilised by the Users who use www.xcally.com, 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 www.xcally.com 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 www.xcally.com. The Data Controller, unless otherwise specified, is the Owner of www.xcally.com.

#### www.xcally.com (or this Application)

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

#### Service

The service provided by www.xcally.com 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.

# education history

Provides access to education history.

# work history

Provides access to work history.

#### Legal information

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

This privacy policy relates solely to www.xcally.com, if not stated otherwise within this document.

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