

# Privacy Policy of togetherplatform.com

Togetherplatform.com collects some Personal Data from its Users.

## Owner and Data Controller

Together (US) Inc.  
251 Little Falls Drive,  
Wilmington, DE 19808  
United States of America

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

## Types of Data collected

Among the types of Personal Data that togetherplatform.com collects, by itself or through third parties, there are: Trackers; Usage Data; User ID; email address; first name; last name; device information; Universally unique identifier (UUID); profession; company name; city; ZIP/Postal code; state; province; country; county; latitude (of city); longitude (of city); metro area; geography/region; IP address; app information; device logs; operating systems; browser information; language; launches; number of sessions; session duration; scroll-to-page interactions; mouse movements; scroll position; keypress events; motion sensor events; touch events; video views; clicks; browsing history; search history; session statistics; page views; interaction events; page events; custom events; Application opens; contact details.

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 togetherplatform.com.

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

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

### Place

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

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

### Retention time

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

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, Hosting and backend infrastructure, Managing support and contact requests, Managing contacts and sending messages, User database management, Traffic optimization and distribution, Content performance and features testing (A/B testing), Infrastructure monitoring, Displaying content from external platforms, Platform services and hosting, Advertising, Tag Management and Spam and bots protection.

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 togetherplatform.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 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 togetherplatform.com. 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.

#### Microsoft Advertising (Microsoft Corporation)

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Trackers; Usage Data.

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

### 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.

#### Google Analytics (Universal Analytics) (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of togetherplatform.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 order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Opt Out](#).

#### FullStory (FullStory, Inc.)

FullStory is an analytics and heat mapping service provided by FullStory, Inc.

FullStory maps how frequently Users interact with the different areas of togetherplatform.com, allowing the Owner to draw conclusions about their interests and preferences. FullStory further allows for the recording of mapping sessions making them available for later visual playback.

Personal Data processed: Trackers; Usage Data.

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

#### **Amplitude Analytics (Amplitude Inc.)**

Amplitude Analytics is an analytics service provided by Amplitude Inc.

Personal Data processed: User ID.

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

#### **HubSpot Analytics (HubSpot, Inc.)**

HubSpot Analytics is an analytics service provided by HubSpot, Inc.

Personal Data processed: Trackers; Usage Data.

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

#### **Google Analytics 4 (Google LLC)**

Google Analytics 4 is a web analysis service provided by Google LLC (“Google”). Google utilizes the Data collected to track and examine the use of togetherplatform.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 server. Users can learn more by consulting [Google’s official documentation](#).

Personal Data processed: Trackers.

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

#### **R!B2B**

Tool to associate activities with other personal information others have about users, including by association with users' email.

#### **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 togetherplatform.com.

#### **Optimizely (Optimizely, Inc.)**

Optimizely is an A/B testing service provided by Optimizely, Inc.

Personal Data processed: Trackers; Usage Data.

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

#### **VWO - Testing (Wingify Software Pvt. Ltd.)**

VWO - Testing is a content performance and features performance testing service provided by Wingify Software Pvt. Ltd.

Personal Data processed: device information; Trackers; Universally unique identifier (UUID); Usage Data.

Place of processing: India – [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 togetherplatform.com and interact with them.

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

#### **Google Fonts (Google LLC)**

Google Fonts is a typeface visualization service provided by Google LLC that allows togetherplatform.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

## **Hosting and backend infrastructure**

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

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.

### **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 States – [Privacy Policy](#).

### **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 States – [Privacy Policy](#).

## **Infrastructure monitoring**

This type of service allows togetherplatform.com 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 togetherplatform.com.

### **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](#).

## **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.

### **Mailgun (Mailgun Technologies, Inc.)**

Mailgun is an email address management and message sending service provided by Mailgun Technologies, Inc.

Personal Data processed: email address.

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

## **Managing support and contact requests**

This type of service allows togetherplatform.com to manage support and contact requests received via email or by other means, such as the contact form.

The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

### **Zendesk (Zendesk, Inc.)**

Zendesk is a support and contact request management service provided by Zendesk Inc.

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

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

## **Platform services and hosting**

These services have the purpose of hosting and running key components of togetherplatform.com, therefore allowing the provision of togetherplatform.com 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.

### **Webflow (Webflow, Inc.)**

Webflow is a platform provided by Webflow, Inc. that allows the Owner to build, run and host togetherplatform.com. Webflow is highly customizable and can host websites from simple blogs to complex e-commerce platforms.

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

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

## **Spam and bots protection**

This type of service analyzes the traffic of togetherplatform.com, 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.

### **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; ZIP/Postal code.

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

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on togetherplatform.com 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 LLC)**

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Trackers.

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

## **Traffic optimization and distribution**

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

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between togetherplatform.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 optimization and distribution service provided by Cloudflare Inc.

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

Personal Data processed: Trackers.

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

## **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 togetherplatform.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 togetherplatform.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 togetherplatform.com.

### **HubSpot CRM (HubSpot, Inc.)**

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

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

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

### **HubSpot Lead Management (HubSpot, Inc.)**

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

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

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

### **ZoomInfo SalesOS (ZoomInfo Technologies LLC)**

ZoomInfo SalesOS is a User database management service provided by ZoomInfo Technologies LLC that manages sales processes.

Personal Data processed: company name; contact details; country; email address; first name; last name.

Place of processing: United States – [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.

## **Cookie Policy**

Togetherplatform.com 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 togetherplatform.com 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, togetherplatform.com 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, togetherplatform.com and any third-party services may collect files that record interaction with togetherplatform.com (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 togetherplatform.com 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 togetherplatform.com (or third-party services employed in togetherplatform.com), which can include: the IP addresses or domain names of the computers utilized by the Users who use togetherplatform.com, 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 togetherplatform.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 togetherplatform.com. The Data Controller, unless otherwise specified, is the Owner of togetherplatform.com.

### **togetherplatform.com (or this Application)**

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

### **Service**

The service provided by togetherplatform.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.

### **Legal information**

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

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