Privacy Policy of haguyoga.com

Haguyoga.com collects some Personal Data from its Users.

Owner and Data Controller

Hagu Yoga Studio di Giulia Peditto | P.IVA IT11391210967 Via Cadolini, 19 20137 Milano

Owner contact email: info@haguyoga.com

Types of Data collected

Among the types of Personal Data that haguyoga.com collects, by itself or through third parties, there are: Trackers; Usage Data; IP address; email address; first name; phone number; payment info; various types of Data; Universally unique identifier (UUID); username; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

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

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 haguyoga.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

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: Analytics, Interaction with data collection platforms and other third parties, Handling payments, Contacting the User, Traffic optimisation and distribution, Displaying content from external platforms, Content commenting, Advertising, Remarketing and behavioural targeting and Building and running haguyoga.com.

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 utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on haguyoga.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 behavioural retargeting technique, i.e. displaying ads tailored to the User's interests and behaviour, including those detected outside haguyoga.com. For more information, please check the privacy policies of the relevant services. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

Meta Audience Network (Meta Platforms Ireland Limited)

Meta Audience Network is an advertising service provided by Meta Platforms Ireland Limited **In order to understand Meta's use of Data, consult Meta's data policy.**

Haguyoga.com may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Meta Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the Facebook ad settings.

Users may opt-out of certain Audience Network targeting through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Audience Network related sections of this privacy policy, if available.

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

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

Meta Lookalike Audience (Meta Platforms Ireland Limited)

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

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

Personal Data processed: Trackers; Usage Data.

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

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 haguyoga.com. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

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.

Matomo (self-hosted) (haguyoga.com)

Matomo is an analytics software used by haguyoga.com to analyse data directly without the help of third parties.

Personal Data processed: IP address; Trackers; Usage Data.

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 haguyoga.com.

Personal Data processed: Trackers; Usage Data.

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

Building and running haguyoga.com

Key components of haguyoga.com are built and run directly by the Owner by making use of the software listed below.

WordPress (self-hosted) (haguyoga.com)

Haguyoga.com is built and run by the Owner via a CMS software (Content Management System) called WordPress.

Personal Data processed: username.

Contacting the User

Contact form (haguyoga.com)

By filling in the contact form with their Data, the User authorises haguyoga.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: email address; first name; various types of Data.

Mailing list or newsletter (haguyoga.com)

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

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

Content commenting

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

Comment system managed directly (haguyoga.com)

Haguyoga.com has its own internal content comment system.

Personal Data processed: email address; first name; Trackers; username.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of haguyoga.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 video widget (Privacy Enhanced Mode) (Google Ireland Limited)

YouTube is a video content visualisation service provided by Google Ireland Limited that allows haguyoga.com to incorporate content of this kind on its pages. This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on haguyoga.com unless they play the video.

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

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

Gravatar (Automattic Inc.)

Gravatar is an image visualisation service provided by Automattic Inc. that allows haguyoga.com to incorporate content of this kind on its pages. Please note that if Gravatar images are used for comment forms, the commenter's email address or parts of it may be sent to Gravatar - even if the commenter has not signed up for that service.

Personal Data processed: email address; Usage Data.

Place of processing: United States – Privacy Policy.

Handling payments

Unless otherwise specified, haguyoga.com 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. Haguyoga.com 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 Technology Europe Ltd)

Stripe is a payment service provided by Stripe Technology Europe Ltd.

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

Place of processing: European Union – Privacy Policy.

Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of haguyoga.com for the purpose of saving and reusing data. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Mailchimp widget (Intuit Inc.)

The Mailchimp widget is a service for interacting with the Mailchimp email address management and message sending service provided by Intuit Inc.

Personal Data processed: email address; first name; phone number.

Place of processing: United States – Privacy Policy.

Remarketing and behavioural targeting

This type of service allows haguyoga.com and its partners to inform, optimize and serve advertising based on past use of haguyoga.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 allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

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 haguyoga.com with the Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

Meta Custom Audience (Meta Platforms Ireland Limited)

Meta Custom Audience is a remarketing and behavioural targeting service provided by Meta Platforms Ireland Limited that connects the activity of haguyoga.com with the Meta Audience Network.

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

Personal Data processed: email address; Trackers.

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

Traffic optimisation and distribution

This type of service allows haguyoga.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 haguyoga.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 haguyoga.com, i.e., communication between haguyoga.com and the User's browser, while also allowing analytical data from haguyoga.com to be collected.

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

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.

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 haguyoga.com depends on the payment system used.

Cookie Policy

Haguyoga.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

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.

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

haguyoga.com (or this Application)

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

Service

The service provided by haguyoga.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 haguyoga.com, if not stated otherwise within this document.

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