Privacy Policy of Bart J Eagle

This Website collects some Personal Data from its Users.

Owner and Data Controller

Bart J. Eagle 620 Fifth Avenue, 2nd Floor New York, NY 10020

Owner contact email: bje@szslaw.com

Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Trackers; first name; last name; phone number; email address; various types of Data; Usage Data; number of Users; session statistics; company name; password; username; geographic position; precise location; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; personal data collected from a known child; interaction events; page views; referral URL; device information; operating systems; browser information.

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

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

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

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

Mode and place of processing the Data

Methods of processing

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

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

Place

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

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

Retention time

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

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Backup saving and management, Collection of privacy-related preferences, Contacting the User, Displaying content from external platforms, Hosting and backend infrastructure, Infrastructure monitoring, Interaction with external social networks and platforms, Analytics, Building and running this Website, Content performance and features testing (A/B testing), Location-based interactions, Managing contacts and sending messages, Registration and authentication provided directly by this Website 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:

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

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

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- · a Sharing in California

Backup saving and management

This type of service allows the Owner to save and manage backups of this Website on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to this Website.

Amazon Glacier (Amazon)

Amazon Glacier is a service to save and manage backups provided by Amazon Web Services Inc.

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

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

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sale in California
- a Sharing in California

Building and running this Website

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

WordPress (self-hosted) (this Website)

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

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

Collection of privacy-related preferences

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

iubenda Privacy Controls and Cookie Solution (iubenda srl)

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

Personal Data processed: Trackers.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Contacting the User

Contact form (this Website)

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

Personal Data processed: email address; first name; last name; phone number; various types of Data.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

• a Sale in California

Content performance and features testing (A/B testing)

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

Google Optimize (Google LLC)

Google Optimize is an A/B testing service provided by Google LLC ("Google").

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Google Optimize 360 (Google LLC)

Google Optimize 360 is an A/B testing service provided by Google LLC ("Google").

This service allows the Owner to target groups of Users on the base of their past use of this Website. Users that <u>opt-out</u> of tracking by Google Analytics will not be included in experiments created in Google Optimize 360.

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction.

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

Google Fonts (Google LLC)

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

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Google Maps widget (Google LLC)

Google Maps is a maps visualization service provided by Google LLC that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Hosting and backend infrastructure

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

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

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

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

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

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sale in California
- a Sharing in California

accessiBe accessWidget (accessiBe Ltd.)

accessiBe accessWidget is a service that helps websites to comply with accessibility standards and is provided by accessiBe Ltd.

Personal Data processed: browser information; clicks; device information; interaction events; operating systems; page views; referral URL; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Infrastructure monitoring

This type of service allows this Website to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of this Website.

Uptime Robot (Buzpark Bilisim Tarim Urunleri Sanayi Tic. Ltd. Sti.)

Uptime Robot is a monitoring service provided by Buzpark Bilisim Tarim Urunleri Sanayi Tic. Ltd. Sti.

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

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

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sale in California
- a Sharing in California

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website. The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on this Website isn't being connected back to the User's profile.

LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

• a Sharing in California

Facebook Like button and social widgets (Meta Platforms, Inc.)

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

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in the United States
- a Sharing in California

Location-based interactions

Non-continuous geolocation (this Website)

This Website may collect, use, and share User location Data in order to provide location-based services.

Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Website.

The geographic location of the User is determined in a manner that isn't continuous, either at the specific request of the User or when the User doesn't point out its current location in the appropriate field and allows the application to detect the position automatically.

Personal Data processed: geographic position; precise location.

Category of Personal Information collected according to the CCPA: geolocation data.

This processing constitutes:

- a Sale in California
- a Sharing in California

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.

Amazon Simple Email Service (SES) (Amazon)

Amazon Simple Email Service is an email address management and message sending service provided by Amazon.com Inc.

Personal Data processed: email address.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sale in California
- a Sharing in California

Registration and authentication provided directly by this Website

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

Direct registration (this Website)

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

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

Spam and bots protection

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

Google reCAPTCHA (Google 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 the CCPA: internet or other electronic network activity information; inferences drawn from other personal information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Further information about the processing of Personal Data

Equal protection of User Data

This Website shares User Data only with third parties carefully selected to ensure that they provide the same or equal protection of User Data as stated in this privacy policy and requested by applicable data protection laws. Further information on data processing and privacy practices by third parties can be found in their respective privacy policies.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

localStorage

localStorage allows this Website to store and access data right in the User's browser with no expiration date.

Profiling of Connecticut consumers

We perform automated processing of your personal data to evaluate, analyze, or predict personal aspects related to, for example, your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. Such profiling activity is done in furtherance of decisions that may result in the provision or denial of, for example, financial or lending services, housing, insurance, education enrollment or opportunity, criminal justice, employment opportunities, healthcare services, or access to essential goods or services.

You always have the right to opt out from this kind of profiling activity. To fully exercise this right to opt out you can contact us at any time, using the contact details provided in this document. To find out more about your rights and how to exercise them, you can consult the section of this document outlining your rights under the CTDPA.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Rights for registered California Users under the age of 18

California's "Online Eraser" law, part of California's Business and Professions Code Sections 22580-22582, requires operators of certain websites and online services targeting minors to allow registered Users who are under the age of 18 and residents of California to request removal of content they post.

If a registered User fits that description and posted content on this Website, they may request removal of such content by contacting the Owner or its privacy policy coordinator at the contact details provided in this document.

In response to this request, the Owner may make content posted by the registered User invisible to other registered Users and the public (rather than deleting it entirely), in which case the content may remain on the Owner's servers. It may also be publicly available elsewhere if a third party copied and reposted this content.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

sessionStorage

sessionStorage allows this Website to store and access data right in the User's browser. Data in sessionStorage is deleted automatically when the session ends (in other words, when the browser tab is closed).

The Service is intended for adults

Users declare themselves to be adult according to their applicable legislation. Minors may not use this Website.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

The Service is not directed to children under the age of 13

Users declare themselves to be adult according to their applicable legislation. Minors may use this Website only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use this Website.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Personal Data collected through sources other than the User

The Owner of this Website may have legitimately collected Personal Data relating to Users without their knowledge by reusing or sourcing them from third parties on the grounds mentioned in the section specifying the legal basis of processing. Where the Owner has collected Personal Data in such a manner, Users may find specific information regarding the source within the relevant sections of this document or by contacting the Owner.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Preference Cookies

Preference Cookies store the User preferences detected on this Website in the local domain such as, for example, their timezone and region.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Collection of personal data about Connecticut consumers aged 13 to 16

We collect personal data of Connecticut consumers between the age of 13 and 16 and won't sell or share their personal data unless those consumers have opted in.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Collection of personal data about Utah consumers aged 13 to 16

We collect personal data of Utah consumers between the age of 13 and 16 and won't sell or share their personal data unless those consumers have opted in.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Collection of personal data about Colorado consumers below the age of 13

We collect, use, or disclose personal data of Colorado consumers below the age of 13 only if we have obtained verifiable parental consent to do so.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Collection of personal data about Connecticut consumers below the age of 13

We collect, use, or disclose personal data of Connecticut consumers below the age of 13 only if we have obtained verifiable parental consent to do so.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Collection of personal data about Utah consumers below the age of 13

We collect, use, or disclose personal data of Utah consumers below the age of 13 only if we have obtained verifiable parental consent to do so.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

We do not collect personal data about Utah consumers below the age of 13

We do not knowingly collect personal data of Utah consumers who are below the age of 13 nor do we sell or process their data for targeted advertising purposes.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

We do not collect personal data about Connecticut consumers below the age of 13

We do not knowingly collect personal data of Connecticut consumers who are below the age of 13 nor do we sell or process their data for targeted advertising purposes.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

We do not collect personal data about Colorado consumers below the age of 13

We do not knowingly collect personal data of Colorado consumers who are below the age of 13 nor do we sell or process their data for targeted advertising purposes.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Cookie Policy

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

Further information for Users

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 this Website 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, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska 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.

• •

Identifiers

• •

Internet or other electronic network activity information

• •

Commercial information

• •

Geolocation data

• •

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 this Website.

For example, you directly provide your Personal Information when you submit requests via any forms on this Website. You also provide Personal Information indirectly when you navigate this Website, 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 this Website 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, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska 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, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana 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 and Iowa

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, 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 this Website.

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 ("GPC"), 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 for Users in the United States

Profiling of Colorado consumers

We perform automated processing of your personal data to evaluate, analyze, or predict personal aspects related to, for example, your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. Such profiling activity is done in furtherance of decisions that may result in the provision or denial of, for example, financial or lending services, housing, insurance, education enrollment or opportunity, criminal justice, employment opportunities, healthcare services, or access to essential goods or services.

You always have the right to opt out from this kind of profiling activity. To fully exercise this right to opt out you can contact us at any time, using the contact details provided in this document. To find out more about your rights and how to exercise them, you can consult the section of this document outlining your rights under the CPA.

Profiling of Virginia consumers

We perform automated processing of your personal data to evaluate, analyze, or predict personal aspects related to, for example, your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. Such profiling activity is done in furtherance of decisions that result in the provision or denial of, for example, financial or lending services, housing, insurance, education enrollment or opportunity, criminal justice, employment opportunities, healthcare services, or access to essential goods or services.

You always have the right to opt out from this kind of profiling activity. To fully exercise this right to opt out you can contact us at any time using the contact details provided in this document. To find out more about your rights and how to exercise them, you can consult the section of this document outlining your rights under the VCDPA.

Collection of personal information about California consumers aged 13 to 16

We collect personal information of consumers between the age of 13 and 16 and won't sell or share their data personal information unless those consumers have opted in.

Collection of personal information about California consumers below the age of 13

We collect personal information of consumers below the age of 13 and won't sell or share their personal information unless their parents or guardians have opted in on behalf of those minors.

Collection of personal data about Virginia consumers below the age of 13

We collect, use, or disclose personal data of Virginia consumers below the age of 13 only if we have obtained verifiable parental consent to do so.

We do not collect personal information about California consumers below the age of 16

We do not knowingly collect personal information of consumers who are below the age of 16 nor do we sell or share it.

We do not collect personal data about Virginia consumers below the age of 13

We do not knowingly collect personal data of Virginia consumers who are below the age of 13 nor do we sell their data or process them for targeted advertising purposes.

Additional information about Data collection and processing

Legal action

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

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

Additional information about User's Personal Data

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

System logs and maintenance

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

Information not contained in this policy

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

Changes to this privacy policy

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

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

Definitions and legal references

Personal Data (or Data) / 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 this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

This Website (or this Application)

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

Service

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

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 behavioral advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral 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.

Cookie

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

Tracker

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

Legal information

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

Latest update: February 09, 2024