

Privacy Policy of www.tooa.com

Www.tooa.com collects some Personal Data from its Users.

Owner and Data Controller

TooA SpA

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Types of Data collected

Among the types of Personal Data that www.tooa.com collects, by itself or through third parties, there are: Trackers; Usage Data; number of Users; device information; session statistics; browser information; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; first name; last name; email address; purchase history; phone number; payment info; billing address; shipping address; order ID; Data communicated while using the service; user content; contents of the email or message; profile picture; date of the message; time the message was sent; sender of the message; gender; date of birth; physical address; password; VAT Number; company name; country; state; county; ZIP/Postal code; city; language.

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 www.tooa.com. Unless specified otherwise, all Data requested by www.tooa.com is mandatory and failure to provide this Data may make it impossible for www.tooa.com to provide its services. In cases where www.tooa.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 www.tooa.com or by the owners of third-party services used by www.tooa.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 www.tooa.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 www.tooa.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, SPAM protection, Tag Management, Advertising, Heat mapping and session recording, Contacting the User, Managing contacts and sending messages, Managing data collection and online surveys, Remarketing and behavioural targeting, Handling payments, Interaction with live chat platforms, Registration and authentication provided directly by www.tooa.com, Platform services and hosting, Managing support and contact requests and Content performance and features testing (A/B testing).

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 www.tooa.com, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers for identifying Users, behavioural retargeting i.e. displaying ads tailored to the User’s interests and behaviour, or to measure ads performance. For more information, please check the privacy policies of the relevant services. Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Meta ads conversion tracking (Meta pixel) (Meta Platforms Ireland Limited)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms Ireland Limited that connects data from the Meta Audience Network with actions performed on www.tooa.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 – [Privacy Policy](#) – [Opt out](#).

Salesforce (Salesforce.com, inc.)

Salesforce is an advertising service provided by Salesforce.com, inc.

Personal Data processed: Trackers; Usage Data.

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

WhatsApp Business direct marketing (Meta Platforms Ireland Limited)

Www.tooa.com may send WhatsApp messages to the User for the purpose of direct marketing. Users may in most cases opt out of receiving direct marketing messages by tapping the opt out of marketing messages button in the chat.

Personal Data processed: answers to questions; contents of the email or message; Data communicated while using the service; date of the message; first name; last name; phone number; profile picture; sender of the message; time the message was sent; user content.

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

Viralize (Viralize Srl)

Viralize is an advertising service provided by Viralize Srl.

Personal Data processed: Trackers; Usage Data.

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

VIADS ADVERTISING (VIADS ADVERTISING S.L.)

VIADS ADVERTISING is an advertising service provided by VIADS ADVERTISING S.L.

Personal Data processed: Trackers; Usage Data.

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

VisitIQ (DrivenIQ Corporation)

VisitIQ is an advertising service provided by DrivenIQ Corporation.

Personal Data processed: Trackers; Usage Data.

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

Analytics

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

Google Analytics 4 (Google Ireland Limited)

Google Analytics 4 is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of [www.tooa.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: browser information; device information; number of Users; session statistics; Trackers; Usage Data.

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

Meta Events Manager (Meta Platforms Ireland Limited)

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on [www.tooa.com](#).

Personal Data processed: Trackers; Usage Data.

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

Contacting the User

Contact form ([www.tooa.com](#))

By filling in the contact form with their Data, the User authorises [www.tooa.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; last name.

Mailing list or newsletter ([www.tooa.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 [www.tooa.com](#). Your email address might also be added to this list as a result of signing up to [www.tooa.com](#) or after making a purchase.

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

Content performance and features testing (A/B testing)

The services contained in this section allow the Owner to track and analyse the User response concerning web traffic or behaviour regarding changes to the structure, text or any other component of [www.tooa.com](#).

Visual Website Optimizer (Wingify)

Visual Website Optimizer is an A/B testing service provided by Wingify Inc.

Personal Data processed: Trackers; Usage Data.

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

Handling payments

Unless otherwise specified, www.tooa.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. Wwww.tooa.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.

Google Pay (Google Ireland Limited)

Google Pay is a payment service provided by Google Ireland Limited, which allows users to make online payments using their Google credentials.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; purchase history; shipping address; Trackers.

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

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data processed: billing address; email address; first name; last name; order ID; shipping address.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

Heat mapping and session recording

Heat mapping services are used to display the areas of www.tooa.com that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyse web traffic and keep track of User behaviour. Some of these services may record sessions and make them available for later visual playback.

Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.

Hotjar honours generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

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

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

Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of www.tooa.com, in order to contact and be contacted by www.tooa.com's support service.

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. Moreover, live chat conversations may be logged.

WhatsApp Business Chat widget (Meta Platforms Ireland Limited)

WhatsApp Business Chat widget is a service for interacting with the WhatsApp instant messaging app and platform provided by Meta Platforms Ireland Limited.

Personal Data processed: answers to questions; contents of the email or message; Data communicated while using the service; date of the message; first name; last name; phone number; profile picture; sender of the message; time the message was sent; user content.

Place of processing: Ireland – [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.

Klaviyo (Klaviyo Inc.)

Klaviyo is an email address management and message sending service provided by Klaviyo Inc.

To take advantage of the service provided by Klaviyo, the Owner typically shares information about (purchasing) Users, such as for example contact details and shopping histories. Check the indication at “Personal Data processed“ below for an explanation of the extent of the sharing.

Personal Data processed: email address.

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

Managing data collection and online surveys

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

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

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

Klaviyo Forms (Klaviyo Inc.)

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

To take advantage of the service provided by Klaviyo, the Owner typically shares information about (purchasing) Users, such as for example contact details and shopping histories. Check the indication at “Personal Data processed“ below for an explanation of the extent of the sharing.

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

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

Managing support and contact requests

This type of service allows www.tooa.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).

WhatsApp Business customer support (Meta Platforms Ireland Limited)

WhatsApp Business customer support is a customer support service provided by Meta Platforms Ireland Limited.

Personal Data processed: Trackers.

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

Platform services and hosting

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

Shopify (Shopify International Limited)

Shopify is a platform provided by Shopify International Limited that allows the Owner to build, run and host an e-commerce website.

Personal Data processed: billing address; device information; email address; first name; last name; payment info; phone number; shipping address; Trackers; Usage Data.

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

Registration and authentication provided directly by www.tooa.com

By registering or authenticating, Users allow www.tooa.com 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 (www.tooa.com)

The User registers by filling out the registration form and providing the Personal Data directly to www.tooa.com.

Personal Data processed: billing address; city; company name; country; county; date of birth; email address; first name; gender; language; last name; password; phone number; physical address; state; VAT Number; ZIP/Postal code.

Remarketing and behavioural targeting

This type of service allows www.tooa.com and its partners to inform, optimise and serve advertising based on past use of www.tooa.com by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioural targeting activity.

Some services offer a remarketing option based on email address lists.

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

Klaviyo segmentation and social advertising (Klaviyo Inc.)

Klaviyo segmentation and social advertising is a remarketing and behavioural targeting service provided by Klaviyo Inc.

Klaviyo segmentation and social advertising makes use of tracking technologies to monitor User behaviour. This Data is then used to personalise the User's experience and to provide targeted advertising. Klaviyo segmentation and social advertising may also connect the collected Data with other networks, including advertising networks, and enable these parties to track and target the User. The Owner, unless otherwise specified in this document, has no direct relationship with the third parties that Klaviyo segmentation and social advertising may be including.

To take advantage of the service provided by Klaviyo, the Owner typically shares information about (purchasing) Users, such as for example contact details and shopping histories. Check the indication at "Personal Data processed" below for an explanation of the extent of the sharing.

Personal Data processed: device information; email address; purchase history; Trackers; Usage Data.

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

SPAM protection

This type of service analyses the traffic of www.tooa.com, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognised as SPAM.

Google reCAPTCHA (Google Ireland Limited)

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

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: Ireland .

Tag Management

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

Google Tag Manager (Google Ireland Limited)

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

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – [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 www.tooa.com depends on the payment system used.

Cookie Policy

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

User

The individual using www.tooa.com who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

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

Data Controller (or Owner)

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

www.tooa.com (or this Application)

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

Service

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

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