

# Privacy Policy of Checkboard

Checkboard collects some Personal Data from its Users.

## Owner and Data Controller

Checkboard Limited  
213 Mirror Works  
12 Marshgate Lane  
London  
E15 2NH

**Owner contact email:** [hello@checkboard.com](mailto:hello@checkboard.com)

## Types of Data collected

Among the types of Personal Data that Checkboard collects, by itself or through third parties, there are: Trackers; Usage Data; email address; phone number; password; first name; last name; Camera permission; Approximate location permission (continuous); Approximate location permission (non-continuous); Bluetooth sharing permission; NFC Reader permission ; Data communicated while using the service; various types of Data; device information; Universally unique identifier (UUID); payment info; billing address.

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

## 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 Checkboard (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, User database management, Managing contacts and sending messages, Remarketing and behavioural targeting, Registration and authentication, Contacting the User, Device permissions for Personal Data access, Collection of privacy-related preferences, Platform services and hosting, Registration and authentication provided directly by Checkboard, Social features, Advertising, Handling payments, Hosting and backend infrastructure and Traffic optimisation and distribution.

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”.

## **Device permissions for Personal Data access**

Depending on the User's specific device, Checkboard may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document. The exact procedure for controlling app permissions may be dependant on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of Checkboard.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by Checkboard.

### **Approximate location permission (continuous)**

Used for accessing the User's approximate device location. Checkboard may collect, use, and share User location Data in order to provide location-based services.

### **Approximate location permission (non-continuous)**

Used for accessing the User's approximate device location. Checkboard may collect, use, and share User location Data in order to provide location-based services.

The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for Checkboard to derive the approximate position of the User on a continuous basis.

### **Bluetooth sharing permission**

Used for accessing Bluetooth related functions such as scanning for devices, connecting with devices, and allowing data transfer between devices.

### **Camera permission**

Used for accessing the camera or capturing images and video from the device.

### **NFC Reader permission**

Allows Checkboard to read contact-less tags.

## **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 Checkboard, 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.

### **LinkedIn conversion tracking (LinkedIn Insight Tag) (LinkedIn Corporation)**

LinkedIn conversion tracking (LinkedIn Insight Tag) is an analytics and behavioural targeting service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on Checkboard. The LinkedIn Insight Tag tracks conversions that can be attributed to LinkedIn ads and enables to target groups of Users on the base of their past use of Checkboard.

Users may opt out of behavioural targeting features through their device settings, [their LinkedIn account settings](#) or by visiting the [AdChoices opt-out page](#).

Personal Data processed: device information; 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.

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

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

Personal Data processed: Trackers; Usage Data.

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

### **Google Analytics (Universal Analytics) (Google Ireland Limited)**

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited (“Google”). Google utilises the Data collected to track and examine the use of Checkboard, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

Personal Data processed: Trackers; Usage Data.

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

## **Collection of privacy-related preferences**

This type of service allows Checkboard 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 Consent Database (iubenda srl)**

The iubenda Consent Database allows to store and retrieve records of Users’ consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User’s device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; Trackers.

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

### **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 Checkboard.

Personal Data processed: Trackers.

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

## **Contacting the User**

### **Phone contact (Checkboard)**

Users that provided their phone number might be contacted for commercial or promotional purposes related to Checkboard, as well as for fulfilling support requests.

Personal Data processed: phone number.

### **Mailing list or newsletter (Checkboard)**

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 Checkboard. Your email address might also be added to this list as a result of signing up to Checkboard or after making a purchase.

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

## **Device permissions for Personal Data access**

Checkboard requests certain permissions from Users that allow it to access the User's device Data as described below.

### **Device permissions for Personal Data access (Checkboard)**

Checkboard requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Approximate location permission (continuous); Approximate location permission (non-continuous); Bluetooth sharing permission; Camera permission; NFC Reader permission .

## **Handling payments**

Unless otherwise specified, Checkboard 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. Checkboard 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 Payments Ltd)**

Stripe is a payment service provided by Stripe Payments Ltd.

Personal Data processed: billing address; email address; first name; last name; payment info; Usage Data.

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

### **Android Pay**

Android Pay is a payment service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, which allows Users to make payments using their mobile phones.

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

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

### **Apple Pay (Apple Inc.)**

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

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

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

## **Hosting and backend infrastructure**

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

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.

### **DigitalOcean (DigitalOcean Inc.)**

DigitalOcean is a hosting service provided by DigitalOcean Inc.

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

Place of processing: United Kingdom – [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.

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

HubSpot Email is an email address management and message sending service provided by HubSpot, Inc.

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

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

### **Sendgrid (Sendgrid)**

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

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

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

### **Platform services and hosting**

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

### **Google Play Store (Google Ireland Limited)**

Checkboard is distributed on the Google Play Store, a platform for the distribution of mobile apps, provided by Google Ireland Limited.

By virtue of being distributed via this app store, Google collects usage and diagnostics data and share aggregate information with the Owner. Much of this information is processed on an opt-in basis.

Users may opt-out of this analytics feature directly through their device settings. More information on how to manage analysis settings can be found on [this page](#).

Personal Data processed: Usage Data.

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

### **App Store Connect (Apple Inc.)**

Checkboard is distributed on Apple's App Store, a platform for the distribution of mobile apps, provided by Apple Inc.

App Store Connect enables the Owner to manage Checkboard on Apple's App Store. Depending on the configuration, App Store Connect provides the Owner with analytics data on user engagement and app discovery, marketing campaigns, sales, in-app purchases, and payments to measure the performance of Checkboard. App Store Connect only collects such data from Users who have agreed to share them with the Owner. Users may find more information on how to opt out via their device settings [here](#).

Personal Data processed: Usage Data.

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

### **WordPress.com (Automattic Inc.)**

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to build, run and host Checkboard.

Personal Data processed: Data communicated while using the service; email address; first name; last name; payment info; phone number; Usage Data.

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

## **Registration and authentication**

By registering or authenticating, Users allow Checkboard to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, Checkboard will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

### **Firebase Authentication (Google Ireland Limited)**

Firebase Authentication is a registration and authentication service provided by Google Ireland Limited. To simplify the registration and authentication process, Firebase Authentication can make use of third-party identity providers and save the information on its platform.

Personal Data processed: email address; password.

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

## **Registration and authentication provided directly by Checkboard**

By registering or authenticating, Users allow Checkboard 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 (Checkboard)**

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

Personal Data processed: email address; phone number.

## **Remarketing and behavioural targeting**

This type of service allows Checkboard and its partners to inform, optimise and serve advertising based on past use of Checkboard 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.

### **Google Ads Remarketing (Google Ireland Limited)**

Google Ads Remarketing is a remarketing and behavioural targeting service provided by Google Ireland Limited that connects the activity of Checkboard with the Google Ads advertising network and the DoubleClick Cookie.

In order to understand Google's use of Data, consult [Google's partner policy](#).

Users can opt out of Google's use of Trackers for ads personalisation by visiting Google's [Ads Settings](#).

Personal Data processed: Trackers; Usage Data.

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

### **LinkedIn Website Retargeting (LinkedIn Corporation)**

LinkedIn Website Retargeting is a remarketing and behavioural targeting service provided by LinkedIn Corporation that connects the activity of Checkboard with the LinkedIn advertising network.

Personal Data processed: Trackers; Usage Data.

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

### **Social features**

#### **Firebase Dynamic Links (Google Ireland Limited)**

Firebase Dynamic Links is a social feature provided by Google Ireland Limited. Dynamic Links are tracked within Firebase or Google Analytics for Firebase, which informs the Owner about the details of the User journey to and within Checkboard.

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

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

#### **Inviting and suggesting friends (Checkboard)**

Checkboard may use the Personal Data provided to allow Users to invite their friends - for example through the address book, if access has been provided - and to suggest friends or connections inside it.

Personal Data processed: various types of Data.

### **Traffic optimisation and distribution**

This type of service allows Checkboard 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 Checkboard 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 Checkboard, i.e., communication between Checkboard and the User's browser, while also allowing analytical data from Checkboard 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](#).

### **User database management**

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Checkboard, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving Checkboard.

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

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

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

Personal Data processed: email address; phone number; various types of Data as specified in the privacy policy of the service.

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

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

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

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

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

### **Intercom (Intercom Software UK Limited)**

Intercom is a User database management service provided by Intercom Software UK Limited. Intercom can also be used as a medium for communications, either through email, or through messages within Checkboard. Intercom Messenger may use Trackers to recognise and track Users behaviour.

Personal Data processed: Data communicated while using the service; email address; Trackers; Universally unique identifier (UUID); Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – [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**

### **Credit Reference Agencies**

Credit Referencing companies

Not only will we be able to work with you more closely to manage your financial health, but we also work with credit reference agencies such as Transunion, Equifax and/or Experian to:

- assess and manage any new tenancy agreements you may enter into;
- assess your financial standing to provide you with suitable products and services;
- manage any accounts that you may already hold, for example reviewing suitable products or adjusting your product in light of your current circumstances;
- contact you in relation to any accounts you may have and recovering debts that you may owe;
- verifying your identity, age and address, to help other organisations make decisions about the services they offer;
- help to prevent crime, fraud and money laundering;
- screen marketing offers to make sure they are appropriate to your circumstances;
- for credit reference agencies to undertake statistical analysis, analytics and profiling,
- and for credit reference agencies to conduct system and product testing and database processing activities, such as data loading, data matching and data linkage.

If you would like to see more information on these, and to understand how the credit reference agencies each use and share data such as bureau data (including the legitimate interests each pursues) this information is provided in this link: [www.transunion.co.uk/crain](http://www.transunion.co.uk/crain); <https://www.equifax.co.uk/crain/>; <https://www.experian.co.uk/legal/crain/>. (For a paper copy, please get in touch with us or with the respective Credit Referencing Agency).

We and the Credit Referencing Agencies we work with will ensure that your information is treated in accordance with UK data protection law, so you can have peace of mind that it will be kept secure and confidential and your information will not be used for prospect marketing purposes.

If you would like advice on how to improve your credit history you can access independent and impartial advice from [www.moneyadvice.org.uk](http://www.moneyadvice.org.uk).

If you would like to see more information on the information shared and obtained from the Credit Reference Agencies, this information is provided in this link: <https://www.transunion.co.uk/legal-information/bureau-privacy-notice>; [https://www.equifax.co.uk/About-us/Privacy\\_policy.html](https://www.equifax.co.uk/About-us/Privacy_policy.html); <https://www.experian.co.uk/privacy/privacy-and-your-data>.

### **Push notifications based on the User's geographic location**

Checkboard may use the User's geographic location to send push notifications for the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for some or all of the apps on the particular device.

Users must be aware that disabling push notifications may negatively affect the utility of Checkboard.

### **Push notifications**



Checkboard may send push notifications to the User to achieve the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for Checkboard, some or all of the apps on the particular device. Users must be aware that disabling push notifications may negatively affect the utility of Checkboard.

## **Automated decision-making**

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on Users, is taken solely by technological means, without any human intervention. Checkboard may use the Users' Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. Checkboard adopts automated decision-making processes as far as necessary to enter into or perform a contract between Users and Owner, or on the basis of the Users' explicit consent, where such consent is required by the law.

Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may also be provided by third parties.

The rationale behind automated decision-making is:

- to enable or otherwise improve the decision-making process;
- to grant Users fair and unbiased treatment based on consistent and uniform criteria;
- to reduce the potential harm derived from human error, personal bias and the like which may potentially lead to discrimination or imbalance in the treatment of individuals etc.;
- to reduce the risk of Users' failure to meet their obligation under a contract. To find out more about the purposes, the third-party services, if any, and any specific rationale for automated decisions used within Checkboard, Users can check the relevant sections in this document.

## **Consequences of automated decision-making processes for Users and rights of Users subjected to it**

As a consequence, Users subject to such processing, are entitled to exercise specific rights aimed at preventing or otherwise limiting the potential effects of the automated decisions taken.

In particular, Users have the right to:

- obtain an explanation about any decision taken as a result of automated decision-making and express their point of view regarding this decision;
- challenge a decision by asking the Owner to reconsider it or take a new decision on a different basis;
- request and obtain from the Owner human intervention on such processing.

To learn more about the Users' rights and the means to exercise them, Users are invited to consult the section of this document relating to the rights of Users.

## **Analysis and predictions based on the User's Data (“profiling”)**

The Owner may use the Personal and Usage Data collected through Checkboard to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.

User profiles can also be created through the use of automated tools like algorithms, which can also be provided by third parties. To find out more about the profiling activities performed, Users can check the relevant sections of this document.

The User always has a right to object to this kind of profiling activity. To find out more about the User's rights and how to exercise them, the User is invited to consult the section of this document outlining the rights of the User.

## **Personal Data collected through sources other than the User**

The Owner of Checkboard 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.

## **Unique device identification**

Checkboard may track Users by storing a unique identifier of their device, for analytics purposes or for storing Users' preferences.

## **User identification via a universally unique identifier (UUID)**

Checkboard may track Users by storing a so-called universally unique identifier (or short UUID) for analytics purposes or for storing Users' preferences. This identifier is generated upon installation of this Application, it persists between Application launches and updates, but it is lost when the User deletes the Application. A reinstall generates a new UUID.

# Cookie Policy

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

### **Checkboard (or this Application)**

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

### **Service**

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

Latest update: 8 March 2024