

Privacy Policy of PunchLab

PunchLab collects some Personal Data from its Users.

This document contains [a section dedicated to Users in the United States and their privacy rights](#).

This document can be printed for reference by using the print command in the settings of any browser.

Owner and Data Controller

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Types of Data collected

Among the types of Personal Data that PunchLab collects, by itself or through third parties, there are: first name; last name; email address; payment info; shipping address; User ID; general activity data; purchase history; username; password; profile picture; social media accounts; Usage Data; Trackers; Social media accounts permission; billing address; device information; Application opens; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); country; Universally unique identifier (UUID); crash data; number of sessions; session duration; operating systems.

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

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 PunchLab (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: Handling payments, Registration and authentication, Handling activity data, Hosting and backend infrastructure, Managing contacts and sending messages, Content performance and features testing (A/B testing), Platform services and hosting, Tag management, Device permissions for Personal Data access, Analytics, Infrastructure monitoring and Handling activities related to productivity.

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, PunchLab 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 dependent on the User's device and software.

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

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

Social media accounts permission

Used for accessing the User's social media account profiles, such as Facebook and Twitter.

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.

MixPanel (MixPanel, Inc.)

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data processed: Trackers; Usage Data.

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

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

Google Analytics for Firebase (for apps) (Google LLC)

Google Analytics for Firebase (for apps) or Firebase Analytics is an analytics service provided by Google LLC. **In order to understand Google's use of Data, consult [Google's partner policy](#).**

Firebase Analytics may share Data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. The User may check this privacy policy to find a detailed explanation about the other tools used by the Owner.

PunchLab uses identifiers for mobile devices and technologies similar to cookies to run the Firebase Analytics service.

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

Personal Data processed: device information; number of sessions; operating systems; session duration; 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.

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 PunchLab.

Firebase Remote Config (Google LLC)

Firebase Remote Config is an A/B testing and configuration service provided by Google LLC.

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

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

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

This processing constitutes:

- a Sale in California

Device permissions for Personal Data access

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

Device permissions for Personal Data access (PunchLab)

PunchLab 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: Social media accounts permission.

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

Handling activities related to productivity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

Gmail (Google LLC)

Gmail is a service that manages email communication provided by Google LLC. Such email communication is not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside this service for advertising purposes in any other way.

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.

Handling activity data

This type of service allows the Owner to use the activity or biometric data collected by your device in order for PunchLab to operate or to provide specific features. This may include movements, heartbeat, change in altitude or data about the surroundings.

Depending on what is described below, third parties may be involved in the activity tracking. Most devices allow for the User to control which Data is accessed or stored.

Apple HealthKit (Apple Inc.)

HealthKit is an activity data handling service provided by Apple Inc. that enables the Owner to access or store activity data.

Personal Data processed: general activity data.

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

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

Handling payments

Unless otherwise specified, PunchLab 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. PunchLab 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.

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: email address; first name; last name; payment info; shipping address.

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

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

Payments processed via the Apple App Store (Apple Inc.)

PunchLab uses a payment service provided by Apple Inc. that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Apple, as described in the [privacy policy for the App Store](#).

Personal Data processed: purchase history.

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

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

Google Pay (Google LLC)

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

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

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

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

Stripe (Stripe, Inc.)

Stripe is a payment service provided by Stripe, Inc.

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

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

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

RevenueCat (RevenueCat, Inc.)

RevenueCat is a payment service provided by RevenueCat, Inc. The service allows the Owner to monitor and analyze the User and their purchase history and can be used to keep track of User behavior.

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

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

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

Payments processed via the Google Play Store (Google Ireland Limited)

PunchLab uses a payment service provided by Google Ireland Limited that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Google, as described in the [privacy policy for the Google Play store](#).

Personal Data processed: billing address; device information; email address; first name; last name; payment info; purchase history; Trackers; Usage Data.

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

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

Hosting and backend infrastructure

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

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.

Firebase Cloud Firestore (Google LLC)

Firebase Cloud Firestore is a hosting and backend service provided by Google LLC.

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

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

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

Firebase Cloud Functions (Google LLC)

Firebase Cloud Functions is a hosting and backend service provided by Google LLC.

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

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

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

Firebase Cloud Storage (Google LLC)

Firebase Cloud Storage is a hosting service provided by Google LLC.

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

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

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

Google App Engine (Google LLC)

Google App Engine is a hosting service provided by Google LLC.

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

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

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

Infrastructure monitoring

This type of service allows PunchLab 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 PunchLab.

Crashlytics with User opt-in (Google LLC)

Crashlytics with User opt-in is a monitoring service provided by Google LLC.

PunchLab allows Users to choose to opt in to the collection of crash reports or analytics.

Personal Data processed: crash data; device information; Universally unique identifier (UUID).

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

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

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.

Firebase Cloud Messaging (Google LLC)

Firebase Cloud Messaging is a message sending service provided by Google LLC. Firebase Cloud Messaging allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments.

Personal Data processed: Trackers; 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; internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Mailgun (Mailgun Technologies, Inc.)

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

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

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

Platform services and hosting

These services have the purpose of hosting and running key components of PunchLab, therefore allowing the provision of PunchLab 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)

PunchLab 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](#).

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

App Store Connect (Apple Inc.)

PunchLab 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 PunchLab 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 PunchLab. 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: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Universally unique identifier (UUID); Usage Data.

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

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

Registration and authentication

By registering or authenticating, Users allow PunchLab 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, PunchLab 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.

Sign in with Apple (Apple Inc.)

Sign in with Apple is a registration and authentication service provided by Apple Inc. In cases where Users are required to provide their email address, Sign in with Apple may generate a private relay address on behalf of Users that automatically forwards messages to their verified personal email account - therefore shielding their actual email address from the Owner.

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

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

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

This processing constitutes:

- a Sale in California

Firebase Authentication (Google LLC)

Firebase Authentication is a registration and authentication service provided by Google LLC. 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; first name; last name; password; profile picture; social media accounts; username.

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

Category of Personal Information collected according to the CCPA: identifiers; audio, electronic, visual, thermal, olfactory, or similar information.

This processing constitutes:

- a Sale in California

Tag management

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

Google Tag Manager (Google LLC)

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

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

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.

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

Push notifications

PunchLab 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 PunchLab, some or all of the apps on the particular device. Users must be aware that disabling push notifications may negatively affect the utility of PunchLab.

Cookie Policy

PunchLab 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.

Further information for Users in the United States

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 PunchLab 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, Tennessee, Minnesota 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

Personal Information collected or disclosed: first name, last name, email address, shipping address, User ID, profile picture, social media accounts, Usage Data, various types of Data as specified in the privacy policy of the service, Trackers, billing address, purchase history, device information, Application opens, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), country, Universally unique identifier (UUID), crash data

Sensitive Personal Information collected or disclosed ⓘ: payment info, username, password

Purposes:

- Handling payments
- Registration and authentication
- Hosting and backend infrastructure
- Managing contacts and sending messages
- Content performance and features testing (A/B testing)
- Further information about Personal Data
- Platform services and hosting
- Infrastructure monitoring

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Apple Inc., Google LLC, Stripe, Inc., RevenueCat, Inc., Mailgun Technologies, Inc., Google Ireland Limited

Service providers or contractors: PunchLab

Commercial information

Personal Information collected or disclosed: first name, last name, email address, shipping address, purchase history, Usage Data, billing address, Trackers, device information

Sensitive Personal Information collected or disclosed ⓘ: payment info

Purposes:

- Handling payments

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Apple Inc., Google LLC, Stripe, Inc., Google Ireland Limited

Geolocation data

Personal Information collected or disclosed: general activity data

Purposes:

- Handling activity data

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Apple Inc.

Audio, electronic, visual, thermal, olfactory, or similar information

Personal Information collected or disclosed: first name, last name, email address, profile picture, social media accounts

Sensitive Personal Information collected or disclosed ⓘ: username, password

Purposes:

- Registration and authentication

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC

Internet or other electronic network activity information

Personal Information collected or disclosed: Usage Data, various types of Data as specified in the privacy policy of the service, Trackers, first name, last name, email address, shipping address, Social media accounts permission, device information, Application opens, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), User ID, billing address, purchase history, Universally unique identifier (UUID), crash data, number of sessions, session duration, operating systems

Sensitive Personal Information collected or disclosed ⓘ: payment info

Purposes:

- Hosting and backend infrastructure
- Managing contacts and sending messages
- Handling payments
- Platform services and hosting
- Tag management
- Device permissions for Personal Data access
- Analytics
- Infrastructure monitoring
- Handling activities related to productivity

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC, Google Ireland Limited, MixPanel, Inc., RevenueCat, Inc., Apple Inc.

Service providers or contractors: PunchLab

 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 “[Detailed information on the processing of Personal Data](#)” 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 PunchLab.

For example, you directly provide your Personal Information when you submit requests via any forms on PunchLab. You also provide Personal Information indirectly when you navigate PunchLab, 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 PunchLab 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, Tennessee, Minnesota 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, Tennessee, Minnesota 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.

In Minnesota Users also have the right to obtain a list of the specific third parties to which the controller has disclosed the consumer's personal data

* Note that in some states like Minnesota you have the following specific rights connected to profiling:

- The right to question the results of the profiling;
- The right to be informed of the reason that the profiling resulted in the decision; if feasible
- The right to be informed of what actions the consumer might have taken to secure a different decision and the actions that the consumer might take to secure a different decision in the future;
- The right to review personal data used in the profiling;
- If inaccurate, the right to have the data corrected and the profiling decision reevaluated based on the corrected data;

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 PunchLab.

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

PunchLab (or this Application)

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

Service

The service provided by PunchLab 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.

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 statement has been prepared based on provisions of multiple legislations.

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

Latest update: June 06, 2025