Privacy Policy of SuccessCOACHING

SuccessCOACHING collects some Personal Data from its Users.

Owner and Data Controller

SuccessCOACHING

8757 Auburn Folsom Road, #3025 Granite Bay, CA 95746 USA

Owner contact email: coaches@successcoaching.co

Types of Data collected

Among the types of Personal Data that SuccessCOACHING collects, by itself or through third parties, there are: first name; last name; company name; email address; number of employees; Cookies; Usage Data; phone number; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Data communicated while using the service; profession; county; state; country; ZIP/Postal code; city; address; website; device information; payment data; geographic position; field of activity; Twitter handle; billing address; language; various types of Data; picture.

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 SuccessCOACHING.

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

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 SuccessCOACHING (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: Contacting the User, Remarketing and behavioral targeting, Analytics, User database management, Platform services and hosting, Content performance and features testing (A/B testing), Tag Management, Displaying content from external platforms, Advertising, Interaction with live chat platforms, Registration and authentication, Interaction with external social networks and platforms, Access to third-party accounts, Commercial affiliation, Handling payments, Heat mapping and session recording, Hosting and backend infrastructure, Infrastructure monitoring, Interaction with data collection platforms and other third parties, Managing contacts and sending messages, Managing data collection and online surveys, Managing landing and invitation pages, Registration and authentication provided directly by SuccessCOACHING, RSS feed management, SPAM protection, Social features, Marketing and Data transfer outside the EU.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Access to third-party accounts

This type of service allows SuccessCOACHING to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

Stripe account access (Stripe Inc)

This service allows SuccessCOACHING to connect with the User's account on Stripe, provided by Stripe, Inc.

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

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

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

This processing constitutes:

• a Sale in California

Twitter account access (X Corp.)

This service allows SuccessCOACHING to connect with the User's account on the Twitter social network, provided by Twitter, Inc.

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

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

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

This processing constitutes:

• a Sale in the United States

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on SuccessCOACHING, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside SuccessCOACHING. 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.

Facebook Audience Network (Facebook, Inc.)

Facebook Audience Network is an advertising service provided by Facebook, Inc. **In order to understand Facebook's use of Data, consult <u>Facebook's data policy.</u>**

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

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

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

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.

This processing constitutes:

- a Sale in California
- a Sharing in California

Facebook Lookalike Audience (Facebook, Inc.)

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Facebook, Inc. that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of SuccessCOACHING or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this opt-out page.

Personal Data processed: Cookies; 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 California
- a Sharing in California

Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on SuccessCOACHING. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

• a Sale in California

Google Ad Manager (Google LLC)

Google Ad Manager is an advertising service provided by Google LLC that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with. In order to opt out from being tracked by various advertising networks, Users may make use of Youronlinechoices. In order to understand Google's use of data, consult Google's partner policy.

This service uses the "DoubleClick" Cookie, which tracks use of SuccessCOACHING and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

- a Sale in California
- a Sharing in California

Google Ads Similar audiences (Google LLC)

Similar audiences is an advertising and behavioral targeting service provided by Google LLC that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of SuccessCOACHING.

On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google <u>Ad Settings</u>.

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

Personal Data processed: Cookies; 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 California
- a Sharing in California

Quora Lookalike Audience (Quora, Inc.)

Quora Lookalike Audience is an advertising and behavioral targeting service provided by Quora, Inc. that uses Data collected through the Quora's pixel in order to display ads to Users with similar behavior to Users who are already in an Audience list on the base of their past use of SuccessCOACHING.

On the base of these Data, personalized ads will be shown to Users suggested by Quora Lookalike Audience.

Users can opt out of Quora's use of cookies for ads personalization by visiting this <u>opt-out page</u>. Quora may still show Users contextualized ads relevant to the content they are viewing.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

Quora List Match Audience (Quora, Inc.)

Quora List Match Audience is an advertising and behavioral targeting service provided by Quora, Inc. that allows the Owner to provide a list of email addresses of existing Users and to then match them with existing Users on the Quora Platform so that they can be targeted with personalized ads.

Users can opt out of receiving personalized ads by contacting Quora support via <u>this page</u>. Quora may still show Users contextualized ads relevant to the content they are viewing.

Personal Data processed: Cookies; email address; 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.

This processing constitutes:

- a Sale in California
- a Sharing in California

Google AdSense (Google LLC)

Google AdSense is an advertising service provided by Google LLC. This service uses the "DoubleClick" Cookie, which tracks use of SuccessCOACHING and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

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

Personal Data processed: Cookies; 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 California
- a Sharing in California

AdEspresso conversion tracking (AdEspresso LLC)

AdEspresso conversion tracking is an analytics service provided by AdEspresso LLC that connects data from the Facebook advertising network with actions performed on SuccessCOACHING.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in California

Google Ads conversion tracking (Google LLC)

Google Ads conversion tracking is an analytics service provided by Google LLC that connects data from the Google Ads advertising network with actions performed on SuccessCOACHING.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in California

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

LinkedIn conversion tracking (LinkedIn Insight Tag) is an analytics and behavioral targeting service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on SuccessCOACHING. 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 SuccessCOACHING.

Users may opt out of behavioral 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.

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

This processing constitutes:

• a Sale in California

Quora Conversion Pixel (Quora, Inc.)

Quora Conversion Pixel is an analytics service provided by Quora, Inc. that connects data from the Quora Platform with actions performed on SuccessCOACHING.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

• a Sale in California

Analytics

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

Google Analytics (Universal Analytics) (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of SuccessCOACHING, to prepare reports on its activities and share them with other Google services.

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

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

Personal Data processed: Cookies; 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

HubSpot Analytics (HubSpot, Inc.)

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

Personal Data processed: Cookies; 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 California

Matomo (SuccessCOACHING)

Matomo is an analytics software used by SuccessCOACHING to analyze data directly without the help of third parties.

Personal Data processed: Cookies; Usage Data.

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

This processing constitutes:

Google Analytics Advertising Reporting Features (Google LLC)

Google Analytics on SuccessCOACHING has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Cookies; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

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.

This processing constitutes:

• a Sale in California

MixPanel (MixPanel)

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data processed: Cookies; 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

Analytics collected directly (SuccessCOACHING)

SuccessCOACHING uses an internal analytics system that does not involve third parties.

Personal Data processed: Cookies; Usage Data.

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

This processing constitutes:

Google Analytics Demographics and Interests reports (Google LLC)

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for SuccessCOACHING (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

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

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.

This processing constitutes:

a Sale in California

Commercial affiliation

This type of service allows SuccessCOACHING to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with SuccessCOACHING.

For details of which data are collected, please refer to the privacy policy of each service.

Amazon Affiliation (Amazon)

Amazon Affiliation is a commercial affiliation service provided by Amazon.com Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

- a Sale in California
- a Sharing in California

Contacting the User

Contact form (SuccessCOACHING)

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

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

Category of Personal Information collected according to the CCPA: identifiers; commercial information; inferences drawn from other personal information.

This processing constitutes:

Mailing list or newsletter (SuccessCOACHING)

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

Personal Data processed: address; city; company name; country; county; email address; first name; last name; profession; state; website; ZIP/Postal code.

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

This processing constitutes:

 a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana

Phone contact (SuccessCOACHING)

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

Personal Data processed: phone number.

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

This processing constitutes:

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 SuccessCOACHING.

Visual Website Optimizer (Wingify)

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

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a Sale in the United States
- Targeted Advertising in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of SuccessCOACHING and interact with them.

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

Google Fonts (Google LLC)

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

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

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

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

This processing constitutes:

• a Sale in California

Font Awesome (Fonticons, Inc.)

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows SuccessCOACHING to incorporate content of this kind on its pages.

Personal Data processed: Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in California

Adobe Fonts (Adobe Systems Incorporated)

Adobe Fonts is a typeface visualization service provided by Adobe Systems Incorporated that allows SuccessCOACHING to incorporate content of this kind on its pages.

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: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Google Maps widget (Google LLC)

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

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

• a Sale in California

Gravatar (Automattic Inc.)

Gravatar is an image visualization service provided by Automattic Inc. that allows SuccessCOACHING to incorporate content of this kind on its pages.

Please note that if Gravatar images are used for comment forms, the commenter's email address or parts of it may be sent to Gravatar - even if the commenter has not signed up for that service.

Personal Data processed: email address; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in California

Headway widget (Oskar Krawczyk/Piotr Zalewa)

Headway widget is a content visualization service provided by Headway and Oskar Krawczyk/Piotr Zalewa.

Personal Data processed: Cookies; Usage Data.

Place of processing: Poland – Privacy Policy.

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

This processing constitutes:

• a Sale in California

YouTube video widget (Google LLC)

YouTube is a video content visualization service provided by Google LLC that allows SuccessCOACHING to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

· a Sale in California

Handling payments

Unless otherwise specified, SuccessCOACHING 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. SuccessCOACHING 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.

Amazon Payments (Amazon)

Amazon Payments is a payment service provided by Amazon.com, Inc., which allows Users to make online payments using their Amazon credentials.

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

Place of processing: See the Amazon privacy policy – <u>Privacy Policy</u>.

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

This processing constitutes:

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: 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: internet or other electronic network activity information.

This processing constitutes:

Payment by bank transfer (SuccessCOACHING)

In the event that the chosen payment method is a direct bank transfer to the current account indicated by SuccessCOACHING, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: address; company name; first name; last name; payment data.

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

This processing constitutes:

PayPal (PayPal Inc.)

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

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

Place of processing: See the PayPal privacy policy – <u>Privacy Policy</u>.

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

This processing constitutes:

 a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana

Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

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

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

Heat mapping and session recording

Heat mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

Smartlook (Smartsupp.com, s.r.o.)

Smartlook is a session recording and heat mapping service provided by Smartsupp.com, s.r.o.

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

Place of processing: Czech Republic – Privacy Policy.

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

This processing constitutes:

• a Sale in California

Hosting and backend infrastructure

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

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.

Google Cloud Storage (Google LLC)

Google Cloud Storage 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 – <u>Privacy Policy</u>.

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

This processing constitutes:

Microsoft Azure (Microsoft Corporation)

Microsoft Azure is a hosting service provided by Microsoft Corporation.

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: internet or other electronic network activity information.

This processing constitutes:

Infrastructure monitoring

This type of service allows SuccessCOACHING 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 SuccessCOACHING.

Sentry (Functional Software, Inc.)

Sentry is a monitoring service provided by Functional Software, Inc. .

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

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

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

This processing constitutes:

Pingdom (Pingdom AB)

Pingdom is a monitoring service provided by Pingdom AB.

Personal Data processed: Cookies; Usage Data.

Place of processing: Sweden – Privacy Policy.

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

This processing constitutes:

Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of SuccessCOACHING for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Typeform widget (TYPEFORM S.L)

The Typeform widget is a service for interacting with the Typeform data collection platform provided by TYPEFORM S.L.

Personal Data processed: address; city; company name; country; county; email address; field of activity; first name; geographic position; last name; number of employees; profession; state.

Place of processing: Spain – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; geolocation data; employment related information; inferences drawn from other personal information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of SuccessCOACHING.

The interaction and information obtained through SuccessCOACHING are always subject to the User's privacy settings for each social network.

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

LinkedIn button and social widgets (LinkedIn Corporation)

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

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

• a Sale in California

Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

· a Sale in California

YouTube button and social widgets (Google LLC)

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google LLC.

Personal Data processed: Usage Data.

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

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

This processing constitutes:

• a Sale in California

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

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

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in the United States

Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of SuccessCOACHING, for contacting and being contacted by SuccessCOACHING support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

Facebook Messenger Customer Chat (Facebook, Inc.)

The Facebook Messenger Customer Chat is a service for interacting with the Facebook Messenger live chat platform provided by Facebook, Inc.

Personal Data processed: Cookies; Data communicated while using the service; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in California

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; 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.

This processing constitutes:

- a Sale in California
- a Sharing in California

Managing data collection and online surveys

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

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

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

Typeform (TYPEFORM S.L)

Typeform is a form builder and data collection platform provided by TYPEFORM S.L.

Personal Data processed: address; country; email address; first name; geographic position; last name; number of employees; profession; state.

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

Category of Personal Information collected according to the CCPA: identifiers; geolocation data; employment related information; inferences drawn from other personal information.

This processing constitutes:

• a Sale in California

Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

Leadpages (Avenue 81, Inc.)

Leadpages is a landing page management service provided by Avenue 81, Inc., that allows SuccessCOACHING to collect the email addresses of Users interested in its service.

Leadpages allows 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 the created landing pages.

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

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

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

This processing constitutes:

• a Sale in California

Marketing

Proof Technologies, Inc.

Proof is a social proof marketing platform provided by Proof Technologies, Inc.

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 SuccessCOACHING, therefore allowing the provision of SuccessCOACHING 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.

Squarespace (Squarespace, Inc)

Squarespace is a platform provided by Squarespace, Inc. that allows the Owner to build, run and host SuccessCOACHING. Squarespace is highly customizable and can host websites from simple blogs to complex e-commerce platforms.

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: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Registration and authentication

By registering or authenticating, Users allow SuccessCOACHING 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, SuccessCOACHING 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.

Facebook Authentication (Facebook, Inc.)

Facebook Authentication is a registration and authentication service provided by Facebook, Inc. and is connected to the Facebook social network.

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: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Linkedin OAuth (LinkedIn Corporation)

Linkedin Oauth is a registration and authentication service provided by Linkedin Corporation and is connected to the Linkedin social network.

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: internet or other electronic network activity information.

This processing constitutes:

• a Sale in the United States

Registration and authentication provided directly by SuccessCOACHING

By registering or authenticating, Users allow SuccessCOACHING 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 (SuccessCOACHING)

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

Personal Data processed: address; billing address; city; company name; country; county; email address; first name; language; last name; state; Twitter handle; various types of Data; website; ZIP/Postal code.

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

This processing constitutes:

Remarketing and behavioral targeting

This type of service allows SuccessCOACHING and its partners to inform, optimize and serve advertising based on past use of SuccessCOACHING 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 behavioral targeting activity.

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

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the <u>Network Advertising Initiative opt-out page</u>.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

AdRoll (AdRoll, Inc.)

AdRoll is an advertising service provided by AdRoll, Inc.

Personal Data processed: Cookies; 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 California
- a Sharing in California

Facebook Custom Audience (Facebook, Inc.)

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of SuccessCOACHING with the Facebook advertising network.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this opt-out page.

Personal Data processed: Cookies; email address.

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

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

Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of SuccessCOACHING with the Facebook advertising network.

Personal Data processed: Cookies; 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 California
- a Sharing in California

Google Ad Manager Audience Extension (Google LLC)

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC that tracks the visitors of SuccessCOACHING and allows selected advertising partners to display targeted ads across the web to them.

Personal Data processed: Cookies; 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 California
- a Sharing in California

Google Ads Remarketing (Google LLC)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of SuccessCOACHING with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

LinkedIn Website Retargeting (LinkedIn Corporation)

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

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

Quora Website Traffic Audience (Quora, Inc.)

Quora Website Traffic Audience is a remarketing and behavioral targeting service provided by Quora, Inc. that connects the activity of SuccessCOACHING with the Quora Platform.

Users can opt out of receiving personalized ads by contacting Quora support via <u>this page</u>. Quora may still show Users contextualized ads relevant to the content they are viewing.

Personal Data processed: Cookies; 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 California
- · a Sharing in California

RSS feed management

This type of service allows SuccessCOACHING to manage RSS feeds and the distribution of their content. Depending on the characteristics of the service used, these services may be used to insert ads within the content and to gather statistics data from them

Feedburner (Google LLC)

Feedburner is a service to manage RSS feeds provided by Google LLC. It allows the collection of statistics on what content is consumed and to insert ads in it.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

a Sale in California

Social features

Public profile (SuccessCOACHING)

Users may have public profiles that other Users can display. In addition to the Personal Data provided, this profile may contain Users' interactions with SuccessCOACHING.

Personal Data processed: city; country; first name; last name; picture; profession; state.

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

This processing constitutes:

SPAM protection

This type of service analyzes the traffic of SuccessCOACHING, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC. The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.

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

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on SuccessCOACHING 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.

Personal Data processed: Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in California

Segment (Segment Inc.)

Segment is a tag management service provided by Segment.io, Inc.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

• a Sale in California

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

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 – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

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 – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

Intercom (Intercom Inc.)

Intercom is a User database management service provided by Intercom Inc. Intercom can also be used as a medium for communications, either through email, or through messages within SuccessCOACHING.

Personal Data processed: Cookies; email address; 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.

This processing constitutes:

• a Sale in California

Clearbit

Clearbit is a data enrichment platform provided by APIHub, Inc.

This processing constitutes:

- a Sale in California
- a Sharing in California

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

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

Push notifications based on the User's geographic location

SuccessCOACHING 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 SuccessCOACHING.

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

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

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by SuccessCOACHING depends on the payment system used.

Push notifications for direct marketing

SuccessCOACHING may send push notifications to the User for the purpose of direct marketing (to propose services and products provided by third parties or unrelated to the product or service provided by SuccessCOACHING).

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 SuccessCOACHING or all of the apps on the particular device.

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

Besides applicable device settings, the User may also make use of the rights described under User rights in the relevant section of this privacy policy.

Personal Data collected through sources other than the User

The Owner of SuccessCOACHING 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.

Automated decision-making

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on the User, is taken solely by technological means, without any human intervention. SuccessCOACHING may use the User's Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. SuccessCOACHING adopts automated decision-making processes as far as necessary to enter into or perform a contract between User and Owner, or on the basis of the User's 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 the 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 User's 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 SuccessCOACHING, 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 User's rights and the means to exercise them, the User is invited to consult the section of this document relating to the rights of the User.

Analysis and predictions based on the User's Data ("profiling")

The Owner may use the Personal and Usage Data collected through SuccessCOACHING 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.

Cookie Policy

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

Further Information for Users in the European Union

This section applies to all Users in the European Union, according to the General Data Protection Regulation (the "GDPR"), and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy. Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the Personal Data, if any, and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document**.

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.

Transfer of Personal Data outside of the European Union

Data transfer abroad based on consent

If this is the legal basis, Personal Data of Users shall be transferred from the EU to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.

In such cases, the Owner shall inform Users appropriately and collect their explicit consent via SuccessCOACHING.

Further information for Users in Brazil

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running SuccessCOACHING and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

This section applies to all Users in Brazil (Users are referred to below, simply as "you", "your", "yours"), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term "personal information" as it is defined in the **LGPD**.

The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

Categories of personal information processed

To find out what categories of your personal information are processed, you can read the section titled "Detailed information on the processing of Personal Data" within this document.

Why we process your personal information

To find out why we process your personal information, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

Your Brazilian privacy rights, how to file a request and our response to your requests

Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

How and when we will respond to your request

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or
 preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration
 procedures.

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 SuccessCOACHING and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "our").

The information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.

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Identifiers

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Commercial information

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Inferences drawn from other personal information

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Internet or other electronic network activity information

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Employment related information

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Geolocation data

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

i You can read the definitions of these concepts inside the "Definitions and legal references section" of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information ("Limit the Use of My Sensitive Personal Information") you can refer to the "<u>Your privacy rights under US state laws</u>" section of our privacy policy.

For more details on the collection of Personal Information, please read the section "<u>Detailed information on the processing of Personal Data</u>" of our privacy policy.

We won't process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use SuccessCOACHING.

For example, you directly provide your Personal Information when you submit requests via any forms on SuccessCOACHING. You also provide Personal Information indirectly when you navigate SuccessCOACHING, 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 SuccessCOACHING and features thereof.

Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- the right to request the deletion of your Personal Information. You have the right to request that we delete any of your Personal Information:
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity provided that this is technically feasible;
- the right to opt out from the Sale of your Personal Information; We will not discriminate against you for exercising your privacy rights.
- the right to non-discrimination.

Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- The right to opt out of the Sharing of your Personal Information for cross-context behavioral advertising;
- The right to request to limit our use or disclosure of your Sensitive Personal Information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana you have

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.

 Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

Additional rights for users residing in Utah and Iowa

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

- The right to opt out of the processing of your Personal Information for Targeted Advertising;
- The right to opt out of the processing of your Sensitive Personal Information. Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

How to exercise your privacy rights under US state laws

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of

your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on SuccessCOACHING.

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

SuccessCOACHING (or this Application)

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

Service

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

Latest update: March 07, 2024