

# Privacy Policy of Carbon

This Application collects some Personal Data from its Users.

Users may be subject to different protection standards and broader standards may therefore apply to some. Users can contact the Owner, to learn more about such standards.

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

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

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

## Owner and Data Controller

Reform, LLC  
3702 W Spruce Street, #1405  
Tampa FL 33607

**Owner contact email:** [support@joincarbon.com](mailto:support@joincarbon.com)

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: email address; password; first name; last name; picture; Cookies; Usage Data; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); device information; geography/region; number of Users ; number of sessions; session duration; In-app purchases; Application opens; Application updates; launches; operating systems; Universally unique identifier (UUID); Data communicated while using the service; payment info; address; contact details; phone number; session statistics; general activity data; IP address; Camera permission; Approximate location permission (non-continuous); Microphone permission; Storage permission; Photo Library permission; Health Data read permission; Health Data update permission ; browser information; city; ZIP/Postal code; state; county; country; latitude (of city); longitude (of city); metro area; answers to questions; various types of Data.

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

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

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

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

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

## Mode and place of processing the Data

### Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (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: Registration and authentication, Hosting and backend infrastructure, Infrastructure monitoring, Platform services and hosting, Analytics, Social features, User database management, Device permissions for Personal Data access, Handling payments, Tag management, Advertising, Remarketing and behavioral targeting, Displaying content from external platforms, Handling activity data, Beta Testing, Managing contacts and sending messages, Contacting the User, Collection of privacy-related preferences, Traffic optimization and distribution, Managing data collection and online surveys and Handling activities related to productivity.

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

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

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

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

The exact procedure for controlling app permissions may be dependent on the User's device and software.

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

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

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

Used for accessing the User's approximate device location. This Application may collect, use, and share User location Data in order to provide location-based services. The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for this Application to derive the approximate position of the User on a continuous basis.

### **Camera permission**

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

### **Health Data read permission**

Allows reading the User's health Data.

### **Health Data update permission**

Allows the updating of the User's health Data.

### **Microphone permission**

Allows accessing and recording microphone audio from the User's device.

## **Photo Library permission**

Allows access to the User's Photo Library.

## **Storage permission**

Used for accessing shared external storage, including the reading and adding of any items.

## **Detailed information on the processing of Personal Data**

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

### **Advertising**

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, 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 this Application. For more information, please check the privacy policies of the relevant services. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

#### **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 this Application.

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

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.

#### **Google Ads enhanced conversions (Google LLC)**

Google Ads enhanced conversions is an advertising service provided by Google LLC that allows the Owner to send hashed first-party conversion Data to Google in order to improve conversion measurements.

Personal Data processed: address; contact details; email address; first name; last name; phone number; Trackers.

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

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

#### **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 this Application. 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 – [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

#### **Direct Email Marketing (DEM) (this Application)**

This Application uses the User Data to propose services and products provided by third parties or unrelated to the product or service provided by this Application.

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

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

## **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 for Firebase (Google LLC)**

Google Analytics for Firebase or Firebase Analytics is an analytics service provided by Google LLC.

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

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

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

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

Personal Data processed: Application opens; Application updates; device information; geography/region; In-app purchases; launches; number of sessions; number of Users ; operating systems; session duration; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

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

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

This processing constitutes:

- a Sale in California

### **Google Analytics 4 (Google LLC)**

Google Analytics 4 is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google's official documentation](#).

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

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

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

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

## **Beta Testing**

This type of service makes it possible to manage User access to this Application, or parts of it, for the purpose of testing a certain feature or the entire Application. The service provider may automatically collect data related to crashes and statistics related to the User's use of this Application in a personally identifiable form.

### **TestFlight (Apple Inc.)**

TestFlight is a beta testing service provided by Apple Inc.

Personal Data processed: device information; 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.

### **Google Play Beta Testing (Google LLC)**

Google Play Beta Testing is a beta testing service provided by Google LLC.

Personal Data processed: Data communicated while using the service; device information; 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.

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

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

### **iubenda Privacy Controls and Cookie Solution (iubenda srl)**

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

Personal Data processed: IP address; Trackers.

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

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

## **Contacting the User**

### **Mailing list or newsletter (this Application)**

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

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

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

### **Contact form (this Application)**

By completing the contact form with their information, the User authorizes this Application to use these details to respond to the inquiries (like quotes, and any other requests).

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

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

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

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

### **Google Health Connect**

We may access sensitive health data (body weight & body fat) through integration with Google Health Connect. We will not use, disclose, or sell this sensitive health data to third parties for advertising, marketing or other use-based data mining purposes. This sensitive health data will solely be used to improve the functionality and ease of use of the application.

### **Device permissions for Personal Data access (this Application)**

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

Personal Data processed: Approximate location permission (non-continuous); Camera permission; Health Data read permission; Health Data update permission ; Microphone permission; Photo Library permission; Storage permission.

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

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

### **Google Fonts (Google LLC)**

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

Personal Data processed: Trackers; Usage Data.

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

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

## **Handling activities related to productivity**

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

### **Google Sheets (Google LLC)**

Google Sheets is an online spreadsheet and collaboration service provided by Google LLC.

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

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

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

## **Handling activity data**

This type of service allows the Owner to use the activity or biometric data collected by your device in order for this Application to operate or to provide specific features. This may include movements, heartbeat, change in altitude or data about the surroundings. Depending on what is described below, third parties may be involved in the activity tracking. Most devices allow for the User to control which Data is accessed or stored.

### **Apple HealthKit (Apple Inc.)**

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

Personal Data processed: general activity data.

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

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

## **Handling payments**

Unless otherwise specified, this Application 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. This Application 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.

### **Android Pay (Google LLC)**

Android Pay is a payment service provided by Google LLC, which allows Users to make payments using their mobile phones.

Personal Data processed: payment info; Trackers; Usage Data.

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

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

#### **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: payment info; Trackers; Usage Data.

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

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

#### **RevenueCat (RevenueCat, Inc.)**

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

Personal Data processed: Trackers; Usage Data.

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

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

#### **Google Pay (Google LLC)**

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

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

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

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

#### **Stripe (Stripe, Inc.)**

Stripe is a payment service provided by Stripe, Inc.

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

### **Hosting and backend infrastructure**

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

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

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

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

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

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

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

This processing constitutes:

## **Infrastructure monitoring**

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

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

### **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 – [Privacy Policy](#).

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

This processing constitutes:

## **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.

### **Constant Contact (Constant Contact, Inc.)**

Constant Contact is an email address management and message sending service provided by Constant Contact, Inc.

Personal Data processed: email address; Trackers; 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.

## **Managing data collection and online surveys**

This type of service allows this Application 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.

### **Google Forms (Google LLC)**

Google Forms is a form builder and data collection platform provided by Google LLC.

Personal Data processed: answers to questions; email address; Trackers; 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; inferences drawn from other personal information.

## **Platform services and hosting**

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

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

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

By virtue of being distributed via this app store, Apple collects basic analytics and provides reporting features that enables the Owner to view usage analytics data and measure the performance of this Application. Much of this information is processed on an opt-in basis.

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

Personal Data processed: Usage Data.

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

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

This processing constitutes:

### **Google Play Store (Google LLC)**

This Application is distributed on the Google Play Store, a platform for the distribution of mobile apps, provided by Google LLC.

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

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

Personal Data processed: Usage Data.

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

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

This processing constitutes:

### **Shopify (Shopify Inc.)**

Shopify is a platform provided by Shopify Inc. that allows the Owner to build, run and host an e-commerce website. This service may place Trackers on the User's device. For the most up-to-date and comprehensive information, refer to the service's [official documentation](#).

Personal Data processed: device information; Trackers; Usage Data.

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

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

### **Webflow (Webflow, Inc.)**

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

Personal Data processed: Trackers; Usage Data.

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

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

## **Registration and authentication**

By registering or authenticating, Users allow this Application 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, this

Application will be able to access some Data, stored by these third-party services, for registration or identification purposes.

### **Auth0 (Auth0, Inc)**

Auth0 is a registration and authentication service provided by Auth0, Inc. To simplify the registration and authentication process, Auth0 can make use of third-party identity providers and save the information on its platform.

Personal Data processed: Cookies; email address; first name; last name; password; picture; 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; audio, electronic, visual, thermal, olfactory, or similar information.

This processing constitutes:

- a Sale in California

### **Sign in with Apple (Apple Inc.)**

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

Personal Data processed: email address.

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

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

This processing constitutes:

- a Sale in California

### **Google OAuth (Google LLC)**

Google OAuth is a registration and authentication service provided by Google LLC and is connected to the Google network.

Personal Data processed: Trackers; 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.

### **Adherence to the Google API Services User Data Policy and Limited Use Requirements (this Application)**

This Application's use or transfer to other apps of information received from Google APIs will adhere to the [Google API Services User Data Policy](#), including the Limited Use requirements.

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

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

### **Remarketing and behavioral targeting**

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application 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. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

### **Meta Custom Audience (Meta Platforms, Inc.)**

Meta Custom Audience is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of this Application with the Meta Audience Network.

Users can opt out of Meta's use of Trackers for ads personalization by visiting this [opt-out page](#).

Personal Data processed: email address; Trackers.

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.

## **Social features**

### **Firebase Dynamic Links (Google LLC)**

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

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

## **Tag management**

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

### **Google Tag Manager (Google LLC)**

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

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

Personal Data processed: 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.

## **Traffic optimization and distribution**

This type of service allows this Application to distribute their content using servers located across different countries and to optimize their performance. Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser. Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

### **Amazon CloudFront (Amazon Web Services, Inc.)**

Amazon CloudFront is a traffic optimization and distribution service provided by Amazon Web Services, Inc.

Personal Data processed: browser information; city; country; county; device information; geography/region; IP address; latitude (of city); longitude (of city); metro area; operating systems; state; Usage Data; ZIP/Postal code.

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

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

This processing constitutes:

- a Sharing in California

### **jsDelivr CDN (Prospect One Sp. z o.o. sp. k.)**

jsDelivr CDN is a traffic optimization and distribution service provided by Prospect One Sp. z o.o. sp. k.

Personal Data processed: Usage Data.

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

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

#### **unpkg (Cloudflare, Inc.)**

unpkg is a traffic optimization and distribution service provided by Cloudflare, Inc.

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.

#### **Fastly CDN (Fastly, Inc.)**

Fastly CDN is a traffic optimization and distribution service provided by Fastly, Inc.

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.

### **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 this Application, 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 this Application.

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

#### **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 this Application. Intercom Messenger may use Trackers to recognize and track Users behavior.

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

Place of processing: United 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

### **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**

#### **Rewardful Inc.**

Rewardful is an affiliate, marketing, and referral program.

Refer to their Privacy Policy - <https://www.rewardful.com/privacy>.

## The Service is intended for adults

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

## 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 this Application depends on the payment system used.

## Equal protection of User Data

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

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

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

## Cookie Policy

This Application 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.

## 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 this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

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

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

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

### Notice at collection

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

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

## Identifiers

**Personal Information collected or disclosed:** email address, first name, last name, various types of Data as specified in the privacy policy of the service, picture, Cookies, Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users , number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, Trackers, Universally unique identifier (UUID), Data communicated while using the service, address, contact details, phone number, IP address, browser information, city, ZIP/Postal code, state, county, country, latitude (of city), longitude (of city), metro area, answers to questions, various types of Data

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

### Purposes:

- Registration and authentication
- Analytics
- User database management
- Handling payments
- Advertising
- Remarketing and behavioral targeting
- Managing contacts and sending messages
- Contacting the User
- Further information about Personal Data
- Traffic optimization and distribution
- Managing data collection and online surveys
- Handling activities related to productivity

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Auth0, Inc, Apple Inc., Google LLC, Intercom Inc., Stripe, Inc., Meta Platforms, Inc., Constant Contact, Inc., Amazon Web Services, Inc.

**Service providers or contractors:** this Application

## Internet or other electronic network activity information

**Personal Information collected or disclosed:** email address, first name, last name, various types of Data as specified in the privacy policy of the service, picture, Cookies, Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users , number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, Trackers, Universally unique identifier (UUID), Data communicated while using the service, address, contact details, phone number, number of Users, session statistics, IP address, Camera permission, Approximate location permission (non-continuous), Microphone permission, Storage permission, Photo Library permission, browser information, city, ZIP/Postal code, state, county, country, latitude (of city), longitude (of city), metro area, answers to questions

**Sensitive Personal Information collected or disclosed** ⓘ: password, payment info, Health Data read permission, Health Data update permission

### Purposes:

- Registration and authentication
- Hosting and backend infrastructure
- Infrastructure monitoring
- Platform services and hosting
- Analytics
- Social features
- User database management
- Handling payments
- Tag management

- Advertising
- Remarketing and behavioral targeting
- Displaying content from external platforms
- Beta Testing
- Managing contacts and sending messages
- Contacting the User
- Collection of privacy-related preferences
- Device permissions for Personal Data access
- Traffic optimization and distribution
- Managing data collection and online surveys

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Auth0, Inc, Amazon Web Services, Inc., Functional Software, Inc. , Apple Inc., Google LLC, Intercom Inc., RevenueCat, Inc., Stripe, Inc., Shopify Inc., Meta Platforms, Inc., Constant Contact, Inc., iubenda srl, Prospect One Sp. z o.o. sp. k., Cloudflare, Inc., Fastly, Inc., Webflow, Inc.

**Service providers or contractors:** this Application

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

**Personal Information collected or disclosed:** email address, first name, last name, various types of Data as specified in the privacy policy of the service, picture, Cookies

**Sensitive Personal Information collected or disclosed** ⓘ: password

**Purposes:**

- Registration and authentication

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Auth0, Inc

## Commercial information

**Personal Information collected or disclosed:** Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users , number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, Trackers, first name, last name, email address

**Sensitive Personal Information collected or disclosed** ⓘ: payment info

**Purposes:**

- Analytics
- Handling payments

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Google LLC, Apple Inc.

## Geolocation data

**Personal Information collected or disclosed:** Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users , number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, general activity data, Camera permission,

Approximate location permission (non-continuous), Microphone permission, Storage permission, Photo Library permission, IP address, browser information, city, ZIP/Postal code, state, county, country, latitude (of city), longitude (of city), metro area

**Sensitive Personal Information collected or disclosed** ⓘ: Health Data read permission, Health Data update permission

**Purposes:**

- Analytics
- Handling activity data
- Device permissions for Personal Data access
- Traffic optimization and distribution

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Google LLC, Apple Inc., Amazon Web Services, Inc.

**Service providers or contractors:** this Application

**Biometric information**

**Personal Information collected or disclosed:** Camera permission, Approximate location permission (non-continuous), Microphone permission, Storage permission, Photo Library permission

**Sensitive Personal Information collected or disclosed** ⓘ: Health Data read permission, Health Data update permission

**Purposes:**

- Device permissions for Personal Data access

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Service providers or contractors:** this Application

**Inferences drawn from other personal information**

**Personal Information collected or disclosed:** answers to questions, Trackers, Usage Data, email address

**Purposes:**

- Managing data collection and online surveys

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Google LLC

ⓘ You can read the definitions of these concepts inside the “[Definitions and legal references section](#)” of the privacy policy.

**To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information (“Limit the Use of My Sensitive Personal Information”) you can refer to the “[Your privacy rights under US state laws](#)” section of our privacy policy.**

For more details on the collection of Personal Information, please read the section “[Detailed information on the processing of Personal Data](#)” of our privacy policy.

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

**What are the sources of the Personal Information we collect?**

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

For example, you directly provide your Personal Information when you submit requests via any forms on this Application. You also provide Personal Information indirectly when you navigate this Application, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

## **Your privacy rights under US state laws**

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

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

### **Additional rights for Users residing in California**

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

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

### **Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana**

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

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- **The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer. In Maryland, your Sensitive Personal Information will be collected or processed only if strictly necessary to provide or maintain a specific product or service requested by you.

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

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

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

### **Additional rights for users residing in Utah and Iowa**

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

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

## How to exercise your privacy rights under US state laws

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

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

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

## How to exercise your rights to opt out

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

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request in a frictionless manner.

## How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

## Additional information for Users in the United States

### We do not collect Personal Information about California consumers below the age of 16

We do not knowingly collect Personal Information of California consumers who are below the age of 16 nor do we Sell or Share it.

### We do not collect Personal Information about Users below the age of 13 in the United States

We do not knowingly collect Personal Information of Users who are below the age of 13 nor do we Sell or process their Information for Targeted Advertising purposes.

## Additional information about Data collection and processing

### Legal action

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

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

### Additional information about User's Personal Data

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

### System logs and maintenance

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

## **Information not contained in this policy**

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

## **Changes to this privacy policy**

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

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

## **Definitions and legal references**

### **Personal Data (or Data) / Personal Information (or Information)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Sensitive Personal Information**

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

### **Usage Data**

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

### **User**

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

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

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

### **Data Controller (or Owner)**

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

### **This Application**

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

### **Service**

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

Latest update: August 19, 2025