

Privacy Policy of GLOBElife

GLOBElife collects some Personal Data from its Users.

Owner and Data Controller

Edizioni HP Srl Via Primo Maggio n.11/13, San Vittore Olona, 20028 (MI)

Owner contact email: info@globelife.com

Types of Data collected

Among the types of Personal Data that GLOBElife collects, by itself or through third parties, there are: Usage Data; Trackers; Data communicated while using the service; various types of Data; email address; first name; last name; phone number; gender; date of birth; VAT Number; company name; profession; physical address; fax number; country; state; county; ZIP/Postal code; city; Tax ID; field of activity; User ID; number of employees; website; answers to questions; geographic position; number of Users; session statistics; device information; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); metadata; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; user content; contents of the email or message; profile picture; date of the message; time the message was sent; sender of the message.

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 GLOBElife.

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

Mode and place of processing the Data

Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of GLOBElife (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

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

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: Tag management, Advertising, Managing data collection and online surveys, Remarketing and behavioural targeting, Interaction with live chat platforms, Traffic optimisation and distribution, Interaction with data collection platforms and other third parties, Interaction with online survey platforms, Heat mapping and session recording, Managing contacts and sending messages, Contacting the User, Displaying content from external platforms, Interaction with external social networks and platforms, Analytics, Hosting and backend infrastructure, Handling payments, Collection of privacy-related preferences, Location-based interactions, Platform services and hosting, Spam and bots protection, RSS feed management and Access to third-party accounts.

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”.

Facebook permissions asked by GLOBElife

GLOBElife may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows GLOBElife to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the [Facebook permissions documentation](#) and to the [Facebook privacy policy](#).

The permissions asked are the following: Basic information, device information, Email, Trackers and Usage 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 GLOBElife 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 authorisation by the User.

Facebook account access (Meta Platforms, Inc.)

This service allows GLOBElife to connect with the User's account on the Facebook social network, provided by Meta Platforms, Inc.

Permissions asked: device information; Email; Trackers; Usage Data.

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

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

Advertising

This type of service allows User Data to be utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on GLOBElife, 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 behavioural retargeting technique, i.e. displaying ads tailored to the User's interests and behaviour, including those detected outside GLOBElife.

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.

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

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Meta Audience Network with actions performed on GLOBElife. 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](#); Ireland – [Privacy Policy](#) – [Opt out](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Hotjar Form Analysis and Conversion Funnels (Hotjar Ltd.)

Hotjar is an analytics service provided by Hotjar Ltd. Hotjar honours generic Do Not Track headers. This means your browser can tell its script not to collect any of your data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Jetpack (Jetpack Digital LLC)

Jetpack is an advertising service provided by Jetpack Digital LLC.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Direct Advertising (GLOBElife)

GLOBElife uses User Data to propose services or products provided by third parties, related or unrelated to the product or service provided by GLOBElife.

Direct Advertising may involve the use of Trackers to monitor Users' behaviour and serve personalised ads. Users may opt-out of ad personalisation by visiting their device settings or following the instructions provided by [YourOnlineChoices](#) and [AdChoices](#).

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

Google Conversion linker (Google LLC)

Google Conversion linker is an analytics service provided by Google LLC that connects Data from the Google advertising services with actions performed on GLOBElife. Depending on the setup of the service, such Data might also be used for retargeting purposes.

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

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

Analytics

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

Alexa Metrics (Alexa Internet, Inc.)

Alexa Metrics is an analytics service provided by Alexa Internet, Inc.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Google Analytics 4 (Google LLC)

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, (“Google”). Google utilizes the Data collected to track and examine the use of GLOBElife, 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](#); Ireland – [Privacy Policy](#) – [Opt out](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

WordPress Stats (Automattic Inc.)

WordPress Stats is an analytics service provided by Automattic Inc. or by Aut O’Matic A8C Ireland Ltd., depending on how the Owner manages the Data processing.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Meta Events Manager (Meta Platforms Ireland Limited)

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on GLOBElife.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Collection of privacy-related preferences

This type of service allows GLOBElife 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 GLOBElife.

Personal Data processed: Trackers.

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

Category of Personal Information collected according to CCPA: internet information.

iubenda Consent Database (iubenda srl)

The iubenda Consent Database allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent. In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

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

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

Category of Personal Information collected according to CCPA: internet information.

Contacting the User

Mailing list or newsletter

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

Personal Data processed: email address; phone number.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

Contact form

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

Personal Data processed: city; company name; country; county; date of birth; email address; fax number; field of activity; first name; gender; last name; number of employees; phone number; physical address; profession; state; Tax ID; Trackers; Usage Data; User ID; various types of Data; VAT Number; website; ZIP/Postal code.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information; employment related information.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of GLOBElife 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 visualisation service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows GLOBElife to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Google Maps Widget (Google LLC)

Google Maps is a maps visualisation service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows GLOBElife to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Font Awesome (Fonticons, Inc.)

Font Awesome is a typeface visualisation service provided by Fonticons, Inc. that allows GLOBElife 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 CCPA: internet information.

This processing constitutes:

- a Sale in California

Google Programmable Search Engine (Google LLC)

Google Programmable Search Engine is a search engine embedding service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows GLOBElife to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Instagram Widget (Meta Platforms, Inc.)

Instagram is an image visualisation service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that allows GLOBElife to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Elfsight (SP Iusupov A.A.)

Elfsight is a widget embedding service provided by SP Iusupov A.A. that allows GLOBElife to incorporate content of this kind on its pages.

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

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

Category of Personal Information collected according to CCPA: internet information.

Handling payments

Unless otherwise specified, GLOBElife 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. GLOBElife isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

Apple Pay (Apple Inc.)

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

Personal Data processed: 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 CCPA: identifiers.

Google Pay (Google LLC)

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

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

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

Category of Personal Information collected according to CCPA: identifiers.

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 – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc, Stripe Technology Europe Ltd or by Stripe Payments Ltd, depending on how the Owner manages the Data processing.

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

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

Category of Personal Information collected according to CCPA: identifiers.

Heat mapping and session recording

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

Hotjar Heat Maps and Recordings (Hotjar Ltd.)

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

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

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

Category of Personal Information collected according to CCPA: identifiers; internet 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 GLOBELife to run and be distributed or to provide a ready-made infrastructure to run specific features or parts of GLOBELife.

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: Italy – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers.

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](#); South Africa – [Privacy Policy](#); Switzerland – [Privacy Policy](#); Germany – [Privacy Policy](#); United Kingdom – [Privacy Policy](#); France – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: identifiers.

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 GLOBELife 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.

Hotjar Recruit User Testers (Hotjar Ltd.)

The Hotjar Recruit User Testers widget is a service for interacting with the Hotjar data collection platform provided by Hotjar Ltd. Hotjar honours generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data; various types of Data.

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

Category of Personal Information collected according to CCPA: identifiers; internet 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 GLOBELife. The interaction and information obtained through GLOBELife 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 GLOBELife isn't being connected back to the User's profile.

X Post Button and Social Widgets (X Corp.)

The X Post Button and Social Widgets are services allowing interaction with the X social network provided by X Corp.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Facebook Like Button and Social Widgets (Meta Platforms, Inc.)

The Facebook Like Button and Social Widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet 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 GLOBELife, in order to contact and be contacted by GLOBELife's support service.

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

Facebook Messenger Customer Chat (Meta Platforms, Inc.)

The Facebook Messenger Customer Chat is a service for interacting with the Messenger instant messaging app and platform provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing.

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

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

WhatsApp Business Chat Widget (Meta Platforms, Inc.)

WhatsApp Business Chat Widget is a service for interacting with the WhatsApp instant messaging app and platform provided by Meta Platforms, Inc.

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

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

Category of Personal Information collected according to CCPA: identifiers; internet information; sensorial information; inferred information.

Interaction with online survey platforms

This type of service allows Users to interact with third-party online survey platforms directly from the pages of GLOBELife. 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.

Hotjar Poll & Survey Widgets (Hotjar Ltd.)

The Hotjar Poll & Survey Widgets are services that enable interaction with the Hotjar platform provided by Hotjar Ltd. Hotjar honours generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Trackers; Usage Data; various types of Data.

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

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

This processing constitutes:

- a Sale in California

Location-based interactions

Geolocation

GLOBELife may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorisation has been provided, the User's location data may be tracked by GLOBELife.

Personal Data processed: geographic position.

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

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana
- a Sharing in California
- Targeted Advertising in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

Non-continuous geolocation

GLOBELife may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorisation has been provided, the User's location data may be tracked by GLOBELife. The geographic location of the User is determined in a manner that isn't continuous, either at the specific request of the User or when the User doesn't point out its current location in the appropriate field and allows the application to detect the position automatically.

Personal Data processed: geographic position.

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

This processing constitutes:

- a Sharing 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.

MailUp (TeamSystem S.p.A.)

MailUp is an email address management and message sending service provided by TeamSystem S.p.A.

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

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

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

- a Sale in California
- a Sharing in California

Mailchimp (Intuit Inc.)

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

Personal Data processed: company name; email address; first name; last name; phone number; various types of Data.

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

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

This processing constitutes:

- a Sale in the United States
- a Sharing in California

Managing data collection and online surveys

This type of service allows GLOBElife 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.

Meta lead ads (Meta Platforms, Inc.)

Meta lead ads is an advertising and data collection service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that allows form-based ads to be shown to Users pre-populated with Personal Data from their Facebook profiles, such as names and email addresses. Depending on the type of advertisement, Users may be requested to provide further information.

Form submission results in the collection and processing of these Data by the Owner under this privacy policy, and only for the specific purpose outlined on the form and/or inside this privacy policy, where provided.

Users may exercise their rights, at any time, including the right to withdraw their consent to the processing of their Data, as specified in the section containing information about User rights in this privacy policy.

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

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Hotjar surveys (Hotjar Ltd.)

Hotjar surveys is a survey builder and data collection platform provided by Hotjar Ltd. Hotjar surveys may use cookies to track User behaviour. Users can Opt-Out of Hotjar surveys cookie tracking by visiting this [opt-out page](#).

Hotjar surveys respects the Do Not Track option available in most modern browsers that, if activated, sends a special signal to stop tracking User activity. Users can find more information on how to enable Do Not Track for each supported browser [here](#).

Personal Data processed: Trackers.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Data provided via online forms, managed directly (GLOBElife)

GLOBElife makes use of online forms that can be used to collect Data about Users.

Personal Data processed: answers to questions.

Category of Personal Information collected according to CCPA: inferred information.

This processing constitutes:

- a Sale in California

Platform services and hosting

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

WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows the Owner to build, run and host GLOBElife.

Any disclosed WordPress extension or plugin that processes Personal Data, processes this data via WordPress.com unless otherwise specified.

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

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

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

Remarketing and behavioural targeting

This type of service allows GLOBElife and its partners to inform, optimize and serve advertising based on past use of GLOBElife by the User.

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

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

Services of this kind usually 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.

Facebook Remarketing (Meta Platforms, Inc.)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of GLOBElife with the Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

RSS feed management

This type of service allows GLOBElife 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.

FeedPress (Beta Et Compagnie Sarl)

FeedPress is a service to manage RSS feeds provided by Beta Et Compagnie Sarl. It allows the collection of statistics on what content is consumed.

Personal Data processed: Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Spam and bots protection

This type of service analyses the traffic of GLOBElife, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognised as spam or protecting it from malicious bots activities.

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a spam protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

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

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information; inferred information.

Tag management

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

Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

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](#); Ireland – [Privacy Policy](#).

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California

Traffic optimisation and distribution

This type of service allows GLOBElife to distribute their content using servers located across different countries and to optimise their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between GLOBElife 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.

jsDelivr CDN (jsdelivr.com)

jsDelivr CDN is a traffic optimisation and distribution service provided by jsdelivr.com.

Personal Data processed: Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Cloudflare (Cloudflare, Inc.)

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc. The way Cloudflare is integrated means that it filters all the traffic through GLOBElife, i.e., communication between GLOBElife and the User's browser, while also allowing analytical data from GLOBElife to be collected.

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

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

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

This processing constitutes:

- a Sale in California

Smush (Insub, LLC)

Smush is a traffic optimisation and distribution service provided by Insub, LLC. The service optimises images used on GLOBElife and may serve them to Users in order to optimise the loading times on GLOBElife.

Personal Data processed: metadata; various types of Data.

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

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

Google Hosted Libraries (Google LLC)

Google Hosted Libraries is a traffic optimisation and distribution service provided by Google LLC.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

cdnjs (Cloudflare, Inc.)

cdnjs is a traffic optimisation 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 CCPA: internet information.

Bunny CDN (BunnyWay d.o.o.)

Bunny CDN is a traffic optimisation and distribution service provided by BunnyWay d.o.o.

Personal Data processed: Usage Data.

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

Category of Personal Information collected according to CCPA: internet information.

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Further information about the processing of Personal Data

Push notifications

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

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 GLOBElife depends on the payment system used.

Cookie Policy

GLOBElife uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;

- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

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 of Data transfers to a country outside the European Union or to any international organisation 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.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

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 Switzerland

This section applies to Users in Switzerland, 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, the retention period and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document.**

The rights of Users according to the Swiss Federal Act on Data Protection

Users may exercise certain rights regarding their Data within the limits of law, including the following:

- right of access to Personal Data;
- right to object to the processing of their Personal Data (which also allows Users to demand that processing of Personal Data be restricted, Personal Data be deleted or destroyed, specific disclosures of Personal Data to third parties be prohibited);
- right to receive their Personal Data and have it transferred to another controller (data portability);
- right to ask for incorrect Personal Data to be corrected.

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, providing Users with the information required by law.

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 GLOBElife 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 anonymised 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 anonymised 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 authorised 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 GLOBElife 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.

Internet or other electronic network activity information

Personal Information collected or disclosed: Usage Data, Trackers, Data communicated while using the service, various types of Data, various types of Data as specified in the privacy policy of the service, first name, last name, gender, date of birth, phone number, company name, profession, physical address, fax number, country, state, county, email address, ZIP/Postal code, city, field of activity, User ID, number of employees, website, number of Users, session statistics, device information, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), metadata, answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, user content, profile picture, date of the message, time the message was sent, sender of the message, Email

Sensitive Personal Information collected or disclosed ⓘ: VAT Number, Tax ID, contents of the email or message

Purposes:

- Tag management
- Advertising
- Managing data collection and online surveys
- Remarketing and behavioural targeting
- Interaction with live chat platforms
- Traffic optimisation and distribution
- Interaction with data collection platforms and other third parties
- Interaction with online survey platforms
- Heat mapping and session recording
- Displaying content from external platforms
- Interaction with external social networks and platforms
- Contacting the User
- Analytics
- Collection of privacy-related preferences
- Platform services and hosting
- Spam and bots protection
- RSS feed management
- Access to third-party accounts

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC, Meta Platforms, Inc., jsdelivr.com, Hotjar Ltd., X Corp., Alexa Internet, Inc., Cloudflare, Inc., iubenda srl, Fonticons, Inc. , Jetpack Digital LLC, Incsub, LLC, Automattic Inc., Beta Et Compagnie Sarl, Meta Platforms Ireland Limited, SP Iusupov A.A., BunnyWay d.o.o.

Service providers or contractors: GLOBElife

Identifiers

Personal Information collected or disclosed: Trackers, Usage Data, various types of Data, various types of Data as specified in the privacy policy of the service, email address, first name, last name, phone number, gender, date of birth, company name, profession, physical address, fax number, country, state, county, ZIP/Postal code, city, field of activity, User ID, number of employees, website, device information, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), metadata, Data communicated while using the service, answers to questions, user content, profile picture, date of the message, time the message was sent, sender of the message, Email

Sensitive Personal Information collected or disclosed ⓘ: VAT Number, Tax ID, contents of the email or message

Purposes:

- Interaction with data collection platforms and other third parties
- Interaction with online survey platforms
- Heat mapping and session recording
- Managing contacts and sending messages
- Contacting the User
- Hosting and backend infrastructure
- Handling payments
- Traffic optimisation and distribution
- Further information about Personal Data
- Advertising
- Platform services and hosting
- Interaction with live chat platforms
- Access to third-party accounts

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Hotjar Ltd., TeamSystem S.p.A., Amazon Web Services, Inc., Apple Inc., Cloudflare, Inc., Google LLC, Intuit Inc., Microsoft Corporation, PayPal Inc., Incsub, LLC, Stripe Inc, Automattic Inc., Meta Platforms, Inc.

Service providers or contractors: GLOBElife

Commercial information

Personal Information collected or disclosed: first name, last name, gender, date of birth, phone number, company name, profession, physical address, fax number, country, state, county, email address, ZIP/Postal code, various types of Data, city, field of activity, User ID, number of employees, website, Trackers, Usage Data

Sensitive Personal Information collected or disclosed ⓘ: VAT Number, Tax ID

Purposes:

- Contacting the User
- Managing contacts and sending messages

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Intuit Inc.

Employment related information

Personal Information collected or disclosed: first name, last name, gender, date of birth, phone number, company name, profession, physical address, fax number, country, state, county, email address, ZIP/Postal code, various types of Data, city, field

of activity, User ID, number of employees, website, Trackers, Usage Data

Sensitive Personal Information collected or disclosed ⓘ: VAT Number, Tax ID

Purposes:

- Contacting the User

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Inferences drawn from other personal information

Personal Information collected or disclosed: answers to questions, Usage Data, Trackers, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, first name, last name, phone number, Data communicated while using the service, user content, profile picture, date of the message, time the message was sent, sender of the message

Sensitive Personal Information collected or disclosed ⓘ: contents of the email or message

Purposes:

- Managing data collection and online surveys
- Spam and bots protection
- Interaction with live chat platforms

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC, Meta Platforms, Inc.

Service providers or contractors: GLOBElife

Geolocation data

Personal Information collected or disclosed: geographic position

Purposes:

- Location-based interactions

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

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

Personal Information collected or disclosed: first name, last name, phone number, Data communicated while using the service, answers to questions, user content, profile picture, date of the message, time the message was sent, sender of the message

Sensitive Personal Information collected or disclosed ⓘ: contents of the email or message

Purposes:

- Interaction with live chat platforms

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Meta Platforms, Inc.

 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 GLOBElife.

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

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

How and when we are expected to handle your request

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

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

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

Additional information about Data collection and processing

Legal action

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

User

The individual using GLOBElife 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 GLOBElife. The Data Controller, unless otherwise specified, is the Owner of GLOBElife.

GLOBElife (or this Application)

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

Service

The service provided by GLOBElife 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 behavioural advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioural 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 policy has been prepared based on provisions of multiple legislations.

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

Latest update: 16 February 2026