

# Privacy Policy of The Global Centre for Risk and Innovation (GCRI)

This Website collects some Personal Data from its Users.

## Owner and Data Controller

The Global Centre for Risk and Innovation (GCRI)

**Owner contact email:** [contact@therisk.global](mailto:contact@therisk.global)

## Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Cookies; Usage Data; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); phone number; first name; last name; email address; username; website; various types of Data; Universally unique identifier (UUID); movement activity; date of birth; general activity data; body measurements & indexes; food related activity ; sleeping activity; heart rate and other vital data; blood type; gender; payment data; address; company name; geographic position; Read only access; Full access; Read metadata; Modify; Insert and import; Compose; Basic settings management; Sensitive settings management; country; county; city; budget; academic background; billing address; profession; state; picture; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Data communicated while using the service; password; VAT Number; profile picture; device information; screenshots; workplace; ZIP/Postal code; purchase history; shipping address; language; number of Users; session statistics; User ID; Data communicated in order to use the Service; IP address; Calendar permission; Contacts permission; Camera permission; Precise location permission (continuous); Precise location permission (non-continuous); Approximate location permission (continuous); Approximate location permission (non-continuous); Microphone permission; Sensors permission; SMS permission; Storage permission; Reminders permission; Motion sensors permission; Bluetooth sharing permission; Social media accounts permission; Microphone permission, without recording; NFC Reader permission ; Biometric Data access permission; Health Data read permission; Health Data update permission ; Siri permission; Apple's speech recognition servers permission; TV Provider permission ; Google Assistant permission; Google Home permission; Call permission; Camera permission, without saving or recording; Write-only Photo Library permission; Phone permission; HomeKit permission; Media Library permission (Music); Photo Library permission; name; social media accounts ; user content; contact info; marital status; fax number; field of activity; number of employees; house number; prefix ; data relating to the point of sale; Twitter handle; Tax ID; Social Security number (SSN); calendar information; precise location; coarse location.

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

## 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 Website (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: Interaction with external social networks and platforms, Analytics, Displaying content from external platforms, Contacting the User, Content commenting, Data transfer outside the EU, Handling activity data, Handling payments, Hosting and backend infrastructure, Infrastructure monitoring, Location-based interactions, Platform services and hosting, Registration and authentication, Registration and authentication provided directly by this Website, Remarketing and behavioral targeting, Social features, SPAM protection, Tag Management, Traffic optimization and distribution, Handling productivity related activity, Data transfer outside of the UK, Advertising, Connecting Data, Access to third-party accounts, Collection of privacy-related preferences, Content performance and features testing (A/B testing), Device permissions for Personal Data access, Managing contacts and sending messages and Managing data collection and online surveys.

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 this Website**

This Website 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 this Website 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**

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

### **About Me**

Provides access to the 'About Me' section of the profile.

### **Access Friend Lists**

Provides access to any friend lists the User created.

### **Access Page CTA**

Provides the access to manage call to actions on User-managed Pages.

### **Access private data**

Access the User's and friends' private data.

### **Access Requests**

Provides read access to the User's friend requests.

## **Activities**

Provides access to the User's list of activities.

## **Age range**

Provides access to the User's age range.

## **App Notifications**

Send notifications.

## **Birthday**

Provides access to the birthday.

## **Books Actions**

Shows when the User has rated, read, quoted from or has said they want to read a book with the app.

## **Business Management API**

Read and write with Business Management API.

## **Chat**

Provides applications that integrate with Facebook Chat the ability to log in Users.

## **Checkins**

Provides read access to the authorized User's check-ins.

## **Contact email**

Access the User's contact email address.

## **Create Events**

Enables the application to create and modify events on the User's behalf.

## **Create notes**

Add or modify notes.

## **Current City**

Provides access to the User's current location.

## **Custom Friend Lists Access**

Provides access to the names of custom lists the User has created to organize their friends.

## **Custom User Actions**

Allows the app retrieve the actions published by another application as specified by the app namespace.

## **Deals**

Read the deal activity.

## **device information**

## **Education History**

Provides access to education history.

### **Email**

Provides access to the User's primary email address.

### **Events**

Provides access to the list of events the User is attending.

### **Export Posts**

Export the posts and make them public. All posts will be exported, including status updates.

### **Friend subscriptions**

Provides access to the User's friends subscriptions associated with the app.

### **Friends' About Me**

Provides access to the 'About Me' section of the friends' profile.

### **Friends' Activities**

Provides access to the friends' list of activities.

### **Friends' birthdays**

Provides access to the friends' birthdays.

### **Friends' Checkins**

Provides read access to the friends' check-ins that the User can see.

### **Friends' Current Cities**

Provides access to the friends' current locations.

### **Friends' Custom User Actions**

Allows the app to retrieve the actions published by another application as specified by the app namespace.

### **Friends' Education History**

Provides access to friends' education history.

### **Friends' Events**

Provides access to the list of events the friends are attending.

### **Friends' Family Members and Relationship Status**

Provides access to a friend's family and personal relationships and relationship status.

### **Friends' Games and App Activity**

Allows the app post and retrieve game achievement activity.

### **Friends' Groups**

Provides access to the list of groups the User's friends are a members of.

### **Friends' Hometown**

Provides access to the friends' hometown.

### **Friends' Interests**

Provides access to the friends' lists of interests.

### **Friends' Likes**

Provides access to the list of all of the pages the friends have liked.

### **Friends' music.listens Actions**

Allows the app to retrieve the actions published by all applications using the built-in music.listens action.

### **Friends' news.read Actions**

Allows the app to retrieve the actions published by all applications using the built-in news.reads action.

### **Friends' Notes**

Provides access to the friends' notes.

### **Friends' Online Presence**

Provides access to the User's friend's online/offline presence.

### **Friends' Photos**

Provides access to the photos the friends have uploaded, and photos the friends have been tagged in.

### **Friends' Questions**

Provides access to the questions the friends have asked.

### **Friends' Significant Others and Relationship Details**

Provides access to the friends' relationship preferences.

### **Friends' Statuses**

Provides access to the friends' status messages and checkins.

### **Friends' video.watches Actions**

Allows the app to retrieve the actions published by all applications using the built-in video.watches action.

### **Friends' Videos**

Provides access to the videos the friends have uploaded and have been tagged in.

### **Friends' Websites**

Provides access to the friends' web site URLs.

### **Friends' Work History**

Provides access to a friend's work history.

### **Games and App Activity**

Allows the app post and retrieve game achievement activity.

### **Gender**

Provides access to the User's gender.

## **Groups**

Provides access to the list of groups the User is a member of.

## **Groups member info**

Provides access to publicly available group member information.

## **Hometown**

Provides access to the User's hometown.

## **Insights**

Provides read access to the Insights data for pages, applications, and domains the user owns.

## **Instagram basic**

Allows reading an Instagram account profile information and media.

## **Instagram manage comments**

Allows the creation, deletion and hiding of comments on behalf of the Instagram account linked to a Page. Also allows reading and responding to public media and comments that a business has been photo tagged in or @mentioned in.

## **Instagram manage insights**

Provides access to insights for the Instagram account linked to a Facebook Page. Also gives the possibility to discover and read the profile information and media of other business profiles.

## **Interests**

Provides access to the User's list of interests.

## **Leads Retrieval**

Allows retrieving and reading all information captured by a lead advertisement form with an advertisement created in Ads Manager or the Marketing API.

## **Likes**

Provides access to the list of all of the pages the User has liked.

## **Link**

Provides access to the Facebook Profile URL of the User.

## **List of Friends**

Provides access to the User's list of friends that also use said app.

## **Manage Advertisements**

Provides the ability to manage ads and call the Facebook Ads API on behalf of a User.

## **Manage Catalog**

Allows creating, reading, updating and deleting business-owned product catalogs for which the User is an administrator.

## **Manage Friend Lists**

Enables the app to create, delete and edit the User's friend lists.

## **Manage Groups**

Manage the User's groups.

## **Manage Mailbox**

Read and send messages from the User's mailbox.

## **Manage Notifications**

Enables the app to read notifications and mark them as read.

## **Manage Pages**

Enables the application to retrieve access\_tokens for Pages and Applications that the User administrates.

## **Managing Page Advertisements**

Allows managing advertisements associated with the Page.

## **Mobile Messaging on behalf of Page**

Send and receive mobile messages on behalf of a Facebook Page.

## **music.listen Action**

Allows the app to retrieve the actions published by all applications using the built-in music.listens action.

## **News Feed and Wall**

Provides access to all the posts in the User's News Feed and enables the application to perform searches against the User's News Feed.

## **news.read Actions**

Allows the app to retrieve the actions published by all applications using the built-in news.reads action.

## **Notes**

Provides access to the User's notes.

## **Offline Access**

Access the data when the User is not using the application.

## **Online Presence**

Provides access to the User's online/offline presence.

## **Page Messaging**

Send and receive messages through a Facebook Page.

## **Pages manage CTA**

Allows carrying out POST and DELETE functions on endpoints used to manage call-to-action buttons on a Facebook Page.

## **Pages manage engagement**

Allows creating, editing and deleting comments posted on the page.

## **Pages manage instant articles**

Allows managing Instant Articles on behalf of Facebook Pages administered by the User.

### **Pages manage metadata**

Allows subscribing and receiving webhooks about activity on the Page, and updating settings on the Page.

### **Pages manage posts**

Allows the creation, editing and deletion of the User's Page posts.

### **Pages read engagement**

Provides access to content (posts, photos, videos, events) posted by the Page, access to followers data (including name, PSID), and profile picture, and access to metadata and other insights about the Page.

### **Pages read User content**

Allows reading User generated content on the Page, such as posts, comments, and ratings by Users or other Pages, and deleting User comments on Page posts.

### **Pages User locale**

Provides access to the User's locale through the connected Page.

### **Pages User timezone**

Grants access to a User's time zone through the connected Page.

### **Photos**

Provides access to the photos the User has uploaded, and photos the User has been tagged in.

### **Post Likes to my Wall**

Publish stories about things the User Likes to the Wall.

### **Publish App Activity**

Allows the app to publish to the Open Graph using Built-in Actions, Achievements, Scores, or Custom Actions. The app can also publish other activity which is detailed in the Facebook's Publishing Permissions document.

### **Publish as Page**

Enables the ability to post, comment and like as any of the Pages managed by the User.

### **Publish Checkins**

Enables the app to perform checkins on behalf of the User.

### **Publish content into groups**

Allows posting content into a group on behalf of the User.

### **Publish to the Wall**

Enables the app to post content, comments, and likes to a User's stream and to the streams of the User's friends.

### **Publish videos**

Allows publishing live videos on the User's timeline.

### **Questions**

Provides access to the questions the User has asked.



## **Read advertisements**

Allows to pull advertisement report information for advertisements accounts owned or granted access to by the owner or owners of other advertisement accounts, through this permission. Also provides access to the Server-Side API to allow advertisers to send web events from their servers directly to Facebook.

## **Read attribution**

Grants access to the Attribution API to pull attribution report data for lines of business owned or granted access to by the owner or owners of other lines of business.

## **Read Group Content**

Lets the app read content in a group managed by the User.

## **Read insights**

Allows reading the Insights data for Pages, apps and web domains the User owns.

## **Read Mailbox**

Provides the ability to read from a user's Facebook Inbox.

## **Read page mailbox**

Lets the app read from the page inboxes of the pages managed by the User.

## **RSVP to Events**

Enables the application to RSVP to events on the User's behalf.

## **Share**

Share items on the User's behalf.

## **Show List of Managed Pages**

Provides the access to show the list of the Pages that the User manages.

## **Significant Other and Relationship Details**

Provides access to the User's relationship preferences.

## **Status**

Provides access to the User's status messages and checkins.

## **Status Updates**

Update the User's status.

## **Tagged Places**

Provides access to the places the User has been tagged at in photos, videos, statuses and links.

## **Trackers**

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.

## **Upload Photos**

Add or modify user's photos.

## **Usage Data**

### **User location**

Allows reading the city name as listed in the location field of a User's Facebook profile.

### **User subscriptions**

Provides access to the User's subscriptions associated with the app.

### **User Timeline Posts Access**

Provides access to the posts on a Users's timeline.

### **User videos**

Allows reading a list of videos uploaded by a User.

### **Video upload**

Add or modify User's videos.

### **video.watches Action**

Allows the app to retrieve the actions published by all applications using the built-in video.watches action.

## **Videos**

Provides access to the videos the User has uploaded and videos the User has been tagged in.

## **Website**

Provides access to the User's web site URL.

## **Whatsapp business management**

Allows reading and/or managing WhatsApp business assets owned or granted access to by other businesses through this permission. These business assets include WhatsApp business accounts, phone numbers and message templates.

## **Work History**

Provides access to work history.

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

Depending on the User's specific device, this Website 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 Website.

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 Website.

### **Apple's speech recognition servers permission**

Used for sending the User's Data to Apple's speech recognition servers.

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

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

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

Used for accessing the User's approximate device location. This Website 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 Website to derive the approximate position of the User on a continuous basis.

### **Biometric Data access permission**

Used for accessing the User's biometrical Data and/or authentication systems, such as for instance, FaceID.

### **Bluetooth sharing permission**

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

### **Calendar permission**

Used for accessing the calendar on the User's device, including the reading, adding and removing of entries.

### **Call permission**

Used for accessing a host of typical features associated with telephony.

### **Camera permission**

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

### **Camera permission, without saving or recording**

Used for accessing the camera or capturing images and video from the device.  
This Website does not save or record the camera output.

### **Contacts permission**

Used for accessing contacts and profiles on the User's device, including the changing of entries.

### **Google Assistant permission**

Used for sending the User's Data to Google Assistant (an artificial intelligence-powered virtual assistant).

### **Google Home permission**

Used for accessing the Google Home and Chromecast devices and enabling this Website to interact with physical accessories in the User's surrounding environment.

### **Health Data read permission**

Allows reading the User's health Data.

### **Health Data update permission**

Allows the updating of the User's health Data.

### **HomeKit permission**

Used for accessing the HomeKit framework and enabling this app to interact with physical accessories in the User's surrounding environment.

### **Media Library permission (Music)**

Allows accessing the User's Media Library audio Data.

### **Microphone permission**

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

### **Microphone permission, without recording**

Allows accessing and recording microphone audio from the User's device. The recording feature is not used on this Website.

### **Motion sensors permission**

Used for accessing the User's device motion sensors to measure the User's activity such as step counts, stairs climbed, and movement type (walking, cycling, etc.).

### **NFC Reader permission**

Allows this Website to read contact-less tags.

### **Phone permission**

Used for accessing a host of typical features associated with telephony. This enables, for instance, read-only access to the “phone state”, which means it enables access to the phone number of the device, current mobile network information, or the status of any ongoing calls.

### **Photo Library permission**

Allows access to the User's Photo Library.

### **Precise location permission (continuous)**

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

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

Used for accessing the User's precise device location. This Website 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 Website to derive the exact position of the User on a continuous basis.

### **Reminders permission**

Used for accessing the Reminders app on the User's device, including the reading, adding and removing of entries.

### **Sensors permission**

Used for accessing data from sensors that Users may use to measure what is happening inside their body, such as for instance, heart rate.

### **Siri permission**

Used for sending the User's Data to Siri (an artificial intelligence-powered virtual assistant).

### **SMS permission**

Used for accessing features related to the User's messaging including the sending, receiving and reading of SMS.

### **Social media accounts permission**

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

### **Storage permission**

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

### **TV Provider permission**

Allows accessing the User's TV provider account.

### **Write-only Photo Library permission**

Allows write-only access to the User's photo library.

## **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 this Website to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorization by the User.

#### **X account access (X Corp.)**

This service allows this Website to connect with the User's account on the X social network, provided by X Corp.

Personal Data processed: Data communicated while using the service; device information; email address; first name; last name; Trackers; Usage Data; username.

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 according to the CCPA, CPA, CTDPA and UCPA

#### **GitHub account access (GitHub Inc.)**

This service allows this Website to connect with the User's account on GitHub, provided by GitHub Inc.

Personal Data processed: device information; 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.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **Facebook account access**

This service allows this Website to connect with the User's account on the Facebook social network, provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing.

Permissions asked: About Me; Access Friend Lists; Access Page CTA; Access private data; Access Requests; Activities; Age range; App Notifications; Birthday; Books Actions; Business Management API; Chat; Checkins; Contact email; Create Events; Create notes; Current City; Custom Friend Lists Access; Custom User Actions; Deals; device information; Education History; Email; Events; Export Posts; Friend subscriptions; Friends' About Me; Friends' Activities; Friends' birthdays; Friends' Checkins; Friends' Current Cities; Friends' Custom User Actions; Friends' Education History; Friends' Events; Friends' Family Members and Relationship Status; Friends' Games and App Activity; Friends' Groups; Friends' Hometown; Friends' Interests; Friends' Likes; Friends' music.listens Actions; Friends' news.read Actions; Friends' Notes; Friends' Online Presence; Friends' Photos; Friends' Questions; Friends' Significant Others and Relationship Details; Friends' Statuses; Friends' video.watches Actions; Friends' Videos; Friends' Websites; Friends' Work History; Games and App Activity; Gender; Groups; Groups member info; Hometown; Insights; Instagram basic; Instagram manage comments; Instagram manage insights; Interests; Leads Retrieval;

Likes; Link; List of Friends; Manage Advertisements; Manage Catalog; Manage Friend Lists; Manage Groups; Manage Mailbox; Manage Notifications; Manage Pages; Managing Page Advertisements; Mobile Messaging on behalf of Page; music.listen Action; News Feed and Wall; news.read Actions; Notes; Offline Access; Online Presence; Page Messaging; Pages manage CTA; Pages manage engagement; Pages manage instant articles; Pages manage metadata; Pages manage posts; Pages read engagement; Pages read User content; Pages User locale; Pages User timezone; Photos; Post Likes to my Wall; Publish App Activity; Publish as Page; Publish Checkins; Publish content into groups; Publish to the Wall; Publish videos; Questions; Read advertisements; Read attribution; Read Group Content; Read insights; Read Mailbox; Read page mailbox; RSVP to Events; Share; Show List of Managed Pages; Significant Other and Relationship Details; Status; Status Updates; Tagged Places; Trackers; Upload Photos; Usage Data; User location; User subscriptions; User Timeline Posts Access; User videos; Video upload; video.watches Action; Videos; Website; Whatsapp business management; Work History.

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

Category of personal information collected according to the CCPA: identifiers; personal information; commercial information; internet or other electronic network activity information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information; employment related information; education information; inferences drawn from other personal information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## 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 Website, 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 Website. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

### **JW Player (LongTail Ad Solutions, Inc.)**

JW Player is an advertising service provided by LongTail Ad Solutions, Inc. .

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **X Ads conversion tracking (X Corp.)**

X Ads conversion tracking is an analytics service provided by X Corp. that connects data from the X advertising network with actions performed on this Website.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Analytics**

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

### **Google Analytics (Universal Analytics)**

Google Analytics (Universal Analytics) 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 this Website, 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.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Google Analytics Demographics and Interests reports**

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

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

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

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **WordPress Stats**

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: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Yandex Metrica (YANDEX, LLC)**

Yandex Metrica is an analytics and heat mapping service provided by YANDEX, LLC.

Yandex Metrica is used to display the areas of this Website that Users interact with most frequently. This shows where the points of interest are.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

#### **Business Contact (Italiaonline S.p.A.)**

Business Contact is an analytics service provided by Italiaonline S.p.A.

Personal Data processed: Tracker; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **Google Analytics (Universal Analytics) with anonymized IP**

Google Analytics (Universal Analytics) 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 this Website, 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.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

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 the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **Cloudflare Web Analytics (Cloudflare, Inc.)**

Cloudflare Web Analytics is an anonymized analytics service provided by Cloudflare, Inc. that gives the Owner insight into the use of this Website by Users without needing to identify them. Further information may be found [here](#) and within the service's privacy policy.

Personal Data processed: device information; language; 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; inferences drawn from other personal information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **Google Analytics 4**



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 this Website, 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](#).

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 the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **YouTube Analytics and Reporting API**

YouTube Analytics and Reporting API is a video content analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Through this Service, this Website may collect Data directly or indirectly on or from Users’ devices, including by making use of trackers. Users may restrict such access to their Data via the [security settings page](#) provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the [Network Advertising Initiative opt-out page](#).

Personal Data processed: Data communicated in order to use the Service; Data communicated while using the service; device information; Trackers; Usage Data; User ID; username.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Analytics collected directly (this Website)**

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

Personal Data processed: Trackers; Usage Data.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Fathom Analytics (Conva Ventures Inc.)**

Fathom Analytics is an anonymized analytics service provided by Conva Ventures Inc. that gives the Owner insight into the use of this Website by Users without needing to identify them. Data collected is anonymized by making use of hashing techniques. Further information may be found [here](#) and within the service's privacy policy.

Personal Data processed: 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.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

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

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

### **iubenda Consent Database (iubenda srl)**

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

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **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 Website.

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.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Connecting Data**

This type of service allows the Owner to connect Data with third-party services disclosed within this privacy policy. This results in Data flowing through these services, potentially causing the retention of this Data.

### **Zapier (Zapier, Inc.)**

Zapier is a workflow automation service provided by Zapier, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; language; last name; password; phone number; picture; profession; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

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

Category of personal information collected according to the CCPA: identifiers; commercial information; biometric information; internet or other electronic network activity information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information; employment related information; inferences drawn from other personal information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Contacting the User**

### **Phone contact (this Website)**

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

Personal Data processed: phone number.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

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

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

Personal Data processed: city; company name; country; county; date of birth; email address; first name; gender; last name; phone number; physical address; profession; state; Trackers; Usage Data; website; ZIP/Postal code.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Contact form (this Website)**

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

Personal Data processed: 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 the CCPA: identifiers; commercial information; internet or other electronic network activity information; employment related information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of this Website.

Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

### **Comment system managed directly (this Website)**

This Website has its own internal content comment system.

Personal Data processed: Cookies; email address; first name; last name; phone number; Usage Data; username; website.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Facebook Comments**

Facebook Comments is a content commenting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Tracker; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Content performance and features testing (A/B testing)**

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of this Website.

### **Google Optimize**

Google Optimize is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

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

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Data transfer outside the EU**

The Owner is allowed to transfer Personal Data collected within the EU to third countries (i.e. any country not part of the EU) only pursuant to a specific legal basis. Any such Data transfer is based on one of the legal bases described below. Users can inquire with the Owner to learn which legal basis applies to which specific service.

### **Data transfer abroad based on consent (this Website)**

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

appropriate safeguards.

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

Personal Data processed: various types of Data.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **Data transfer abroad based on standard contractual clauses (this Website)**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to “standard contractual clauses” provided by the European Commission.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

Personal Data processed: various types of Data.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **Data transfer from the EU and/or Switzerland to the U.S based on Privacy Shield (this Website)**

If this is the legal basis, the transfer of Personal Data from the EU or Switzerland to the US is carried out according to the EU - U.S. and Swiss - U.S. Privacy Shield.

In particular, Personal Data is transferred to services that self-certify under the Privacy Shield framework and therefore guarantee an adequate level of protection of such transferred Data. All services are listed within the relevant section of this document and those that adhere to Privacy Shield can be singled out by checking their privacy policy and possibly also by specifically checking for Privacy Shield adherence in the official Privacy Shield List. Privacy Shield also specifically guarantees rights to Users which can be found in its most current form on the website run by the US Department of Commerce.

Personal Data may be transferred from within the EU or Switzerland to the U.S. to services that are not, or not anymore, part of Privacy Shield, only based on other valid legal grounds. Users can ask the Owner to learn about such legal grounds.

Personal Data processed: various types of Data.

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

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

#### **Data transfer to countries that guarantee European standards (this Website)**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

Personal Data processed: various types of Data.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Other legal basis for Data transfer abroad (this Website)**

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
- the data transferred is sourced from a public register created under the law of the country that the data originates from;
- subject to further conditions, the Owner has a compelling legitimate interest to perform a one-off transfer of Personal Data.

In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Website.

Personal Data processed: various types of Data.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

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

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

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

This Website 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: Apple's speech recognition servers permission; Approximate location permission (continuous); Approximate location permission (non-continuous); Biometric Data access permission; Bluetooth sharing permission; Calendar permission; Call permission; Camera permission; Camera permission, without saving or recording; Contacts permission; Google Assistant permission; Google Home permission; Health Data read permission; Health Data update permission ; HomeKit permission; Media Library permission (Music); Microphone permission; Microphone permission, without recording; Motion sensors permission; NFC Reader permission ; Phone permission; Photo Library permission; Precise location permission (continuous); Precise location permission (non-continuous); Reminders permission; Sensors permission; Siri permission; SMS permission; Social media accounts permission; Storage permission; TV Provider permission ; Write-only Photo Library permission.

Category of personal information collected according to the CCPA: identifiers; biometric information; internet or other electronic network activity information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Displaying content from external platforms**

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

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

### **Google Fonts**

Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website 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 the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Font Awesome (Fonticons, Inc. )**

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows this Website 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.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **GitHub button and social widgets (GitHub Inc.)**

The GitHub button and social widgets are services allowing interaction with the GitHub and Gist services provided by GitHub, 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.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Google Maps widget**

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

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Gravatar**

Gravatar is an image visualization service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

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

Personal Data processed: email address; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Instagram widget**

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

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **Vimeo video (Vimeo, LLC)**

Vimeo is a video content visualization service provided by Vimeo, LLC that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **YouTube video widget**

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **YouTube video widget (Privacy Enhanced Mode)**

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on this Website unless they play the video.

Personal Data processed: Trackers; Universally unique identifier (UUID); Usage Data.



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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Google Programmable Search Engine**

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 this Website to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **JWPlayer widget (LongTail Ad Solutions, Inc. )**

JWPlayer is a video content visualization service provided by LongTail Ad Solutions, Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **Adobe Fonts (Adobe Systems Incorporated)**

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

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

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **YouTube IFrame Player**

YouTube IFrame Player is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Through this Service, this Website may collect Data directly or indirectly on or from Users' devices, including by making use of trackers. Users may restrict such access to their Data via the [security settings page](#) provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the [Network Advertising Initiative opt-out page](#).

Personal Data processed: Data communicated in order to use the Service; Data communicated while using the service; device information; Trackers; Usage Data; User ID; username.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Google Calendar widget**

Google Calendar widget is a calendar content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website 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 the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **SoundCloud widget (SoundCloud Limited)**

Soundcloud is an audio content delivery service provided by SoundCloud Limited that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Spotify widget (Spotify AB)**

Spotify is an audio content delivery service provided by Spotify AB that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### **YouTube Data API**

YouTube Data API is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate functions normally executed on YouTube so that Users can watch, find, and manage YouTube content directly on this Website.

Through this Service, this Website may collect Data directly or indirectly on or from Users' devices, including by making use of Trackers. Users may restrict such access to their Data via the [security settings page](#) provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the [Network Advertising Initiative opt-out page](#).

Personal Data processed: Data communicated in order to use the Service; Data communicated while using the service; device information; Trackers; Usage Data; User ID; username.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Calendly widget (Calendly, LLC)**

Calendly widget is a calendar content visualization service provided by Calendly, LLC that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: calendar information; device information; email address; geographic position; 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; geolocation data.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Handling activity data**

This type of service allows the Owner to use the activity data collected by your device in order for this Website 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.

#### **Activity data tracked by your device (this Website)**

This Website uses some activity data tracked by your device to operate or to provide specific features.

Personal Data processed: blood type; body measurements & indexes; date of birth; food related activity ; gender; general activity data; heart rate and other vital data; movement activity; sleeping activity.

Category of personal information collected according to the CCPA: identifiers; biometric information; geolocation data; inferences drawn from other personal information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## Handling payments

Unless otherwise specified, this Website 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 Website 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.

### Payment by bank transfer (this Website)

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

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### 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 the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### Stripe

Stripe is a payment service provided by Stripe, Inc., Stripe Payments Europe, Limited, Stripe Payments UK, Ltd, Stripe Brasil Soluções de Pagamento - Instituição de Pagamento Ltda., Stripe Payments Canada, Ltd., Stripe India Private Ltd., Stripe Japan KK, Stripe Payments Malaysia Sdn. Bhd., Stripe Payments Mexico, S. de R.L. de C.V., Stripe New Zealand Limited, Stripe Payments Singapore Pte. Ltd. or by Stripe Payments (Thailand) 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](#); Gibraltar – [Privacy Policy](#); Hong Kong – [Privacy Policy](#); Liechtenstein – [Privacy Policy](#); Norway – [Privacy Policy](#); Switzerland – [Privacy Policy](#); United Arab Emirates – [Privacy Policy](#); United Kingdom – [Privacy Policy](#); Brazil – [Privacy Policy](#); Canada – [Privacy Policy](#); India – [Privacy Policy](#); Japan – [Privacy Policy](#); Malaysia – [Privacy Policy](#); Mexico – [Privacy Policy](#); New Zealand – [Privacy Policy](#); Singapore – [Privacy Policy](#); Thailand – [Privacy Policy](#).

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### Apple Pay (Apple Inc.)

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

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; purchase history; shipping address; 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; commercial information; internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## Handling productivity related activity

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 Workspace

Google Workspace is an integrated suite of cloud-based productivity, collaboration and storage services provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. Gmail or other G Suite services are not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside these services for advertising purposes in any other way.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; password; phone number; physical address; profession; profile picture; screenshots; Trackers; Usage Data; username; VAT Number; workplace.

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

Category of personal information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information; employment related information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

### Gmail

Gmail is a service that manages email communication provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. Such email communication is not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside this service for advertising purposes in any other way.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; last name; phone number; physical address; profession; profile picture; screenshots; Trackers; Usage Data; username; VAT Number; workplace.

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

Category of personal information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information; employment related information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### Airtable (Formagrid, Inc.)

Airtable is an online spreadsheet and collaboration service provided by Formagrid, Inc.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; phone number; physical address; profession; profile picture; screenshots; Trackers; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

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

Category of personal information collected according to the CCPA: identifiers; commercial information; biometric information; internet or other electronic network activity information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information; employment related information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## Google Docs

Google Docs is an online text-editing and collaboration service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: city; company name; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; phone number; physical address; profession; profile picture; Trackers; Usage Data; username; workplace.

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

Category of personal information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information; employment related information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## Hosting and backend infrastructure

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

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.

### GitHub Pages (GitHub Inc.)

GitHub Pages is a hosting service provided by GitHub, 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:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### DigitalOcean (DigitalOcean Inc.)

DigitalOcean is a hosting service provided by DigitalOcean Inc.

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

Place of processing: United States – [Privacy Policy](#); Canada – [Privacy Policy](#); United Kingdom – [Privacy Policy](#); Netherlands – [Privacy Policy](#); Germany – [Privacy Policy](#); India – [Privacy Policy](#); Singapore – [Privacy Policy](#).

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **OpenAI API (OpenAI, L.L.C.)**

The OpenAI API provided by OpenAI, L.L.C. is a service that helps the Owner to automate tasks through its AI engine.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; language; last name; phone number; picture; profession; screenshots; Trackers; Usage Data; username; workplace; ZIP/Postal code.

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; audio, electronic, visual, thermal, olfactory, or similar information; employment related information; inferences drawn from other personal information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Infrastructure monitoring**

This type of service allows this Website 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 Website.

### **Pingdom (Pingdom AB)**

Pingdom is a monitoring service provided by Pingdom AB.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **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 this Website. The interaction and information obtained through this Website 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 this Website isn't being connected back to the User's profile.

### **Facebook Like button and social widgets**

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: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **LinkedIn button and social widgets (LinkedIn Corporation)**

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

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **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: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **YouTube button and social widgets**

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **PayPal button and widgets (PayPal Inc.)**

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).



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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Reddit button and widgets (reddit inc.)**

The reddit button and widgets are services allowing interaction with the reddit platform provided by reddit inc.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Pinterest “Pin it” button and social widgets (Pinterest, Inc.)**

The Pinterest “Pin it” button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data processed: Cookies; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Location-based interactions**

### **Geolocation (this Website)**

This Website 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 authorization has been provided, the User’s location data may be tracked by this Website.

Personal Data processed: geographic position.

Category of personal information collected according to the CCPA: geolocation data.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Non-continuous geolocation (this Website)**

This Website 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 authorization has been provided, the User’s location data may be tracked by this Website. 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: coarse location; geographic position; precise location.

Category of personal information collected according to the CCPA: geolocation data.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **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.

### **Mailchimp (Intuit Inc.)**

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

Personal Data processed: company name; country; Data communicated while using the service; date of birth; email address; first name; gender; last name; phone number; physical address; Trackers; Usage Data; username; various types of 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.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

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

This type of service allows this Website 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.

### **Data provided via online forms, managed directly (this Website)**

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

Personal Data processed: answers to questions; billing address; city; company name; contact info; country; date of birth; email address; first name; gender; language; last name; marital status; name; payment info; phone number; physical address; profession; profile picture; social media accounts ; Trackers; Usage Data; user content; workplace.

Category of personal information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; audio, electronic, visual, thermal, olfactory, or similar information; employment related information; inferences drawn from other personal information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Platform services and hosting**

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

WordPress.com is a platform provided by Automattic Inc. or by Automattic Ireland Ltd., depending on how the Owner manages the Data processing, that allows the Owner to build, run and host this Website.

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 the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Registration and authentication**

By registering or authenticating, Users allow this Website 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 Website will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

#### **YouTube OAuth**

YouTube OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the YouTube network.

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 the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **Facebook Authentication**

Facebook Authentication is a registration and authentication service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

#### **GitHub OAuth (GitHub Inc.)**

GitHub OAuth is a registration and authentication service provided by GitHub Inc. and is connected to the GitHub network.

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

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Google OAuth**

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Google network.

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 the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Gmail permissions to access User Data (OAuth addition)**

To provide its service, this Website uses restricted scopes for Gmail which allow access to User Data related to this Google service (as indicated below). This access is provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, [under strict terms](#). Here's what this means for such User Data:

- The use of User Data is limited to providing or improving User-facing features. User Data will not be used for serving ads, including retargeting, personalized, or interest-based advertising.
- User Data will be transferred to third parties only if necessary, to provide or improve User-facing features and as necessary to comply with applicable law or as part of a merger, acquisition, or sale of assets with notice to Users.
- Humans will not read the Data unless:
  - the Owner has obtained the User's affirmative agreement for specific messages;
  - it is necessary for security purposes and/or to comply with applicable law, or;
  - the use is limited to internal operations and the Data (including derivations) have been aggregated and anonymized.

Personal Data processed: Basic settings management; Compose; Full access; Insert and import; Modify; Read metadata; Read only access; Sensitive settings management.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **X OAuth (X Corp.)**

X OAuth is a registration and authentication service provided by X Corp. and is connected to the X social network.

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

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **LinkedIn OAuth (LinkedIn Corporation)**

LinkedIn OAuth is a registration and authentication service provided by LinkedIn Corporation and is connected to the LinkedIn social network.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **WordPress.com Single Sign On**

WordPress.com Single Sign On is a registration and authentication service provided by Automattic Inc. or by Automattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, and is connected to the WordPress.com network.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Facebook OAuth**

Facebook OAuth is a registration and authentication service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Trackers; various types of Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Twitch.tv Authentication (Twitch Interactive, Inc.)**

Twitch.tv Authentication is a registration and authentication service provided by Twitch Interactive, 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:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

## **Direct registration and profiling (this Website)**

By registering or authenticating directly through this Website, Users allow this Website to identify them and give them access to dedicated services. The Owner may process Data collected when Users register or authenticate also for targeting and profiling purposes; to find out more, Users can contact the Owner using the contact details provided in this document.

Personal Data processed: billing address; budget; company name; country; county; data relating to the point of sale; date of birth; email address; fax number; field of activity; first name; gender; geographic position; house number; language; last name; marital status; number of employees; password; phone number; physical address; picture; prefix ; profession; profile picture; shipping address; Social Security number (SSN); state; Tax ID; Trackers; Twitter handle; Usage Data; User ID; username; various types of Data; VAT Number; website; workplace; ZIP/Postal code.

Category of personal information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information; employment related information; inferences drawn from other personal information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Registration and authentication provided directly by this Website**

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

### **Direct registration (this Website)**

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

Personal Data processed: academic background; address; billing address; budget; city; company name; Cookies; country; county; date of birth.

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Remarketing and behavioral targeting**

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

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

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

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the [Network Advertising Initiative opt-out page](#).

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

### **Remarketing with Google Analytics**

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the tracking activity performed by Google Analytics and its Trackers with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Google Ads Remarketing**

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie.

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

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

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 the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **X Ads remarketing (X Corp.)**

X Ads remarketing is a remarketing and behavioral targeting service provided by X Corp. that connects the activity of this Website with the X advertising network.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **X Custom Audiences (X Corp.)**

X Custom Audiences is a remarketing and behavioral targeting service provided by X Corp. that connects the activity of this Website with the X advertising network.

Users can opt out from interest-based ads by going to: [Personalization and Data](#).

Personal Data processed: email address; 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.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Google Ad Manager Audience Extension**

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that tracks the visitors of this Website and



allows selected advertising partners to display targeted ads across the web to them.

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](#); Ireland – [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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Social features**

### **Public profile (this Website)**

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

Personal Data processed: address; city; company name; country; county; date of birth; email address; first name; gender; geographic position; last name; phone number; picture; profession; state; username.

Category of personal information collected according to the CCPA: identifiers; commercial information; biometric information; geolocation data; audio, electronic, visual, thermal, olfactory, or similar information; employment related information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **SPAM protection**

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

### **Akismet**

Akismet is a SPAM protection service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland 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](#); Ireland – [Privacy Policy](#).

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Google reCAPTCHA**

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](#).

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 the CCPA: internet or other electronic network activity information; inferences drawn from other personal information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Tag Management**

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

Personal Data processed: Usage Data.

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

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

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **Traffic optimization and distribution**

This type of service allows this Website 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 Website and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

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

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

The way Cloudflare is integrated means that it filters all the traffic through this Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

Personal Data processed: Cookies; 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 according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## **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**

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

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

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

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

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Automated decision-making**

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

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

The rationale behind automated decision-making is:

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

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

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

In particular, Users have the right to:

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

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

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

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

The Owner of this Website may have legitimately collected Personal Data relating to Users without their knowledge by reusing or sourcing them from third parties on the grounds mentioned in the section specifying the legal basis of processing.

Where the Owner has collected Personal Data in such a manner, Users may find specific information regarding the source within the relevant sections of this document or by contacting the Owner.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Push notifications**

This Website 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 this Website, some or all of the apps on the particular device.

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

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

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

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

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

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

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Push notifications for direct marketing**

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

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

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

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.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **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 Website depends on the payment system used.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

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

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

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Preference Cookies**

Preference Cookies store the User preferences detected on this Website in the local domain such as, for example, their timezone and region.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Pseudonymous use**

When registering for this Website, Users have the option to indicate a nickname or pseudonym. In this case, Users' Personal Data shall not be published or made publicly available. Any activity performed by Users on this Website shall appear in connection with the indicated nickname or pseudonym. However, Users acknowledge and accept that their activity on this Website, including content, information or any other material possibly uploaded or shared on a voluntary and intentional basis may directly or indirectly reveal their identity.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Browser Fingerprinting**

Browser Fingerprinting creates an identifier based on a device's unique combination of characteristics (e.g. IP address, HTTP header, browser properties etc.), that allows to distinguish the User from other Users, thereby enabling to track the User's browsing behavior across the web. Browser Fingerprinting does not have an expiration date and cannot be deleted.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Equal protection of User Data**

This Website 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.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **localStorage**

localStorage allows this Website to store and access data right in the User's browser with no expiration date.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Rights for registered California Users under the age of 18**

California's "Online Eraser" law, part of California's Business and Professions Code Sections 22580-22582, requires operators of certain websites and online services targeting minors to allow registered Users who are under the age of 18 and residents of California to request removal of content they post.

If a registered User fits that description and posted content on this Website, they may request removal of such content by contacting the Owner or its privacy policy coordinator at the contact details provided in this document.

In response to this request, the Owner may make content posted by the registered User invisible to other registered Users and the public (rather than deleting it entirely), in which case the content may remain on the Owner's servers. It may also be publicly available elsewhere if a third party copied and reposted this content.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **sessionStorage**

sessionStorage allows this Website to store and access data right in the User's browser. Data in sessionStorage is deleted automatically when the session ends (in other words, when the browser tab is closed).

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Unique device identification**

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

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Access the address book**

This Website may request access to your address book.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

## **Cookie Policy**

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

# Further Information for Users

## Legal basis of processing

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

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

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

## Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

## Details about the right to object to processing

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Transfer of Personal Data outside of the European Union**

### **Data transfer abroad based on consent**

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

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

### **Data transfer abroad based on standard contractual clauses**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to "standard contractual clauses" provided by the European Commission.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

### **Data transfer to countries that guarantee European standards**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

### **Other legal basis for Data transfer abroad**

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
- the data transferred is sourced from a public register created under the law of the country that the data originates from;
- subject to further conditions, the Owner has a compelling legitimate interest to perform a one-off transfer of Personal Data.

In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Website.

## **Transfer of Personal Data outside of the United Kingdom**

### **Data transfer abroad based on consent (UK)**

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

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

### **Data transfer abroad based on standard contractual clauses (UK)**

If this is the legal basis, the transfer of Personal Data from the UK to third countries is carried out by the Owner according to “standard contractual clauses” provided by the European Commission.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation, which are recognized as valid also under UK law. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

### **Data transfers according to a UK adequacy regulation**

If this is the legal basis, the transfer of Personal Data from the UK to third countries may take place according to a so called “adequacy regulation” of the UK Government.

The UK Government adopts adequacy regulations for specific countries or territories whenever such countries or territories guarantee Personal Data protection standards comparable to those set forth by UK data protection legislation. Users can find an updated list of all adequacy regulations on the website of the Information Commissioner’s Office (ICO).

### **Other legal basis for Data transfer abroad (UK)**

If no other legal basis applies, Personal Data shall be transferred from the UK to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User’s request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
- the data transferred is sourced from a public register created under UK law;
- subject to further conditions, the Owner has a compelling legitimate interest to perform a one-off transfer of Personal Data.

In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Website.

## **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.

## **Transfer of Personal Data outside of Switzerland**

### **Transfer of Data outside of Switzerland based on standard data protection clauses**

If this is the legal basis, Personal Data can be transferred outside of Switzerland, if such transfer is carried out according to standard data protection clauses previously approved, established or recognized by the Federal Data Protection and Information Commissioner.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by Swiss law. For further information, Users are requested to contact the Owner through the contact details provided in this document.

### **Transfer of Data outside of Switzerland based on the Users' consent**

If this is the legal basis, Personal Data can be transferred outside of Switzerland if Users consent to such transfer.

When collecting Users' consent, the Owner makes sure to provide all the information that Users need to make an educated decision and to understand the implications and consequences of providing or denying their consent.

**Users may withdraw their consent at any time.**

### **Transfer of Data outside of Switzerland to third countries that guarantee an adequate level of data protection**

If this is the legal basis, Personal Data can be transferred outside of Switzerland to a destination country, or international organization guaranteeing an adequate level of protection of the Data according to a decision of the Swiss Federal Council.

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

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

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

## **The grounds on which we process your personal information**

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

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

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

## **Categories of personal information processed**

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

## **Why we process your personal information**

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



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

## Your Brazilian privacy rights

You have the right to:

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

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

## How to file your request

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

## How and when we will respond to your request

We will strive to promptly respond to your requests.

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

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

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

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

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

## Transfer of personal information outside of Brazil permitted by the law

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

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

## **Additional information for Users in Brazil**

### **Transfer of personal information outside of Brazil based on contracts and other legal means**

We can transfer your personal information outside of the Brazilian territory provided that we are able to ensure that any further processing of your personal information will be in compliance with the principles and the rules established by the LGPD, and your rights are safeguarded.

To do so, we may use one of the following legal means:

- specific contractual clauses for each given transfer. This means that we will enter into an agreement with the recipient of your personal information to make sure that such transfers meet the requirements explained above. Such an agreement shall be subject to the ANPD's prior verification;
- standard contractual clauses. These clauses set terms and conditions for the transfer of personal information and are adopted by the ANPD;
- global corporate clauses. These clauses set terms and conditions for the transfer of personal information within an organisation and, before they come into force, are subject to the ANPD's prior verification;
- seals of approval, certificates and codes of conduct regularly issued by the ANPD. These legal instruments allow us to transfer your personal information provided that we abide by their rules. They are subject to the previous approval of the ANPD.

### **Transfer of personal information outside of Brazil based on your consent**

We can transfer your personal information outside of the Brazilian territory if you consent to such transfer.

When we ask for your consent, we'll make sure to provide all the information that you need to make an educated decision and to understand the implications and consequences of providing or denying your consent.

Such information will be given in clear and plain language and in such a way that you'll be able to clearly distinguish these requests from other consent requests that we may possibly ask.

**You may withdraw your consent at any time.**

### **Transfer of personal information outside of Brazil to countries that guarantee the same protection standards as LGPD**

We can transfer your personal information outside of the Brazilian territory, if the destination country, or the international organization which receives the personal information, provides an adequate level of protection of the personal information according to the ANPD.

The ANPD authorizes such transfers whenever it considers that country to possess and provide personal information protection standards comparable to those set forth by the LGPD, having taken into account the following:

- the general and sectoral rules of the legislation in force in the country of destination or in the international organization;
- the nature of the personal information subject to the transfer;
- the compliance with the general principles on the protection of the personal information and on the rights of the individuals as set forth in the LGPD;
- the adoption of suitable security measures;
- the existence of judicial and institutional guarantees for the respect of personal information protection rights; and
- any other pertinent circumstance related to the relevant transfer.

## **Further information for California consumers**

This section 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 Website 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 (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the state of California, United States of America, according to the "[California Consumer Privacy Act of 2018](#)" (the "CCPA"), as updated by the "California Privacy Rights Act" (the "CPRA") and subsequent regulations. For such consumers, this section supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the terms "personal information" (and "sensitive personal information") as defined in the California Consumer Privacy Act (CCPA).

### **Notice at collection**

#### **Categories of personal information collected, used, sold, or shared**

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. **You can read about these activities in detail in the section titled "Detailed information on the processing of**

## **Personal Data” within this document.**

### **Information we collect: the categories of personal information we collect**

We have collected the following categories of personal information about you: identifiers, personal information, commercial information, biometric information, internet or other electronic network activity information, geolocation data, audio, electronic, visual, thermal, olfactory, or similar information, employment related information, education information and inferences drawn from other personal information.

We have collected the following categories of sensitive personal information: username, movement activity, body measurements & indexes, sleeping activity, heart rate and other vital data, blood type, payment data, username, password, VAT Number, username, VAT Number, username, VAT Number, payment info, username, password, VAT Number, username, username, Precise location permission (continuous), Precise location permission (non-continuous), Biometric Data access permission, Health Data read permission, Health Data update permission , username, username, username, payment info, marital status, username, password, VAT Number, Tax ID, Social Security number (SSN), marital status, username, username, precise location, VAT Number and Tax ID

We will not collect additional categories of personal information without notifying you.

### **Your right to limit the use or disclosure of your sensitive personal information and how you can exercise it**

You have the right to request that we limit the 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.

We can also use your sensitive personal information to perform specific purposes set forth by the law (such as, including but not limited to, helping to ensure security and integrity; undertaking activities to verify or maintain the quality or safety of our service) and as authorized by the relevant regulations.

Outside of the aforementioned specific purposes, you have the right to freely request, at any time, that we do not use or disclose your sensitive personal information. This means that whenever you ask us to stop using your sensitive personal information, we will abide by your request and we will instruct our service providers and contractors to do the same.

To fully exercise your right to limit the use or disclosure of your sensitive personal information you can contact us at any time, using the contact details provided in this document.

For a simplified method you can also use the privacy choices link provided on this Website.

We use any personal information collected from you in connection with the submission of your request solely for the purposes of complying with the request.

Once you have exercised this right, we are required to wait at least 12 months before asking whether you have changed your mind.

### **What are the purposes for which we use your personal information?**

We may use your personal information to allow the operational functioning of this Website and features thereof (“business purposes”). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section “Detailed information on the processing of Personal Data” within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

### **How long do we keep your personal information?**

Unless stated otherwise inside the “Detailed information on the processing of Personal Data” section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

### **How we collect information: 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 Website.

For example, you directly provide your personal information when you submit requests via any forms on this Website. You also provide personal information indirectly when you navigate this Website, 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.

#### **How we use the information we collect: disclosing of your personal information with third parties for a business purpose**

For our purposes, the word “third party” means a person who is not any of the following: a service provider or a contractor, as defined by the CCPA.

We disclose your personal information with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

#### **Sale or sharing of your personal information**

For our purposes, the word “sale” means any “selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer’s personal information by the business to a **third party, for monetary or other valuable consideration**”, as defined by the CCPA.

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

For our purposes, the word “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 or not 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 CCPA.

Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CCPA, does not constitute a sale or sharing of your personal information.

#### **Your right to opt out of the sale or sharing of your personal information and how you can exercise it**

We sell or share your personal information with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

You have the right to opt out of the sale or sharing of your personal information. This means that whenever you request us to stop selling or sharing your personal information, we will abide by your request.

Such requests can be made freely, at any time, without submitting any verifiable request.

To fully exercise your right to opt out, you can contact us at any time using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

If you want to submit requests to opt out of the sale or sharing of personal information via a user-enabled global privacy control, like the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request in a frictionless manner (as defined in the CPRA regulations). The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a [participating browser](#) or browser extension. More information about downloading GPC is available [here](#).

We use any personal information collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

#### **What are the purposes for which we use your personal information?**

We may use your personal information to allow the operational functioning of this Website and features thereof (“business purposes”). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section “Detailed information on the processing of Personal Data” within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

## **How long do we keep your personal information?**

Unless stated otherwise inside the “Detailed information on the processing of Personal Data” section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

## **Your privacy rights under the California Consumer Privacy Act and how to exercise them**

### **The right to access personal information: the right to know and to portability**

You have the right to request that we disclose to you:

- the categories of personal information that we collect about you;
- the sources from which the personal information is collected;
- the purposes for which we use your information;
- to whom we disclose such information;
- the specific pieces of personal information we have collected about you.

You also have **the right to know what personal information is sold or shared and to whom**. In particular, you have the right to request two separate lists from us where we disclose:

- the categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared;
- the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance — provided that this is technically feasible.

### **The right to request the deletion of your personal information**

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on this Website, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and notify any of our service providers and all third parties to whom we have sold or shared the personal information to do so — provided that this is technically feasible and doesn't involve disproportionate effort.

### **The right to correct inaccurate personal information**

You have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

### **The right to opt out of sale or sharing of personal information and to limit the use of your sensitive personal information**

You have the right to opt out of the sale or sharing of your personal information. You also have the right to request that we limit our use or disclosure of your sensitive personal information.

### **The right of no retaliation following opt-out or exercise of other rights (the right to non-discrimination)**

We will not discriminate against you for exercising your rights under the CCPA. This means that we will not discriminate against you, including, but not limited to, by denying goods or services, charging you a different price, or providing a different level or quality of goods or services just because you exercised your consumer privacy rights.

However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction.

To the extent permitted by the law, we may offer you promotions, discounts, and other deals in exchange for collecting, keeping, or selling your personal information, provided that the financial incentive offered is reasonably related to the value of your personal information.

## **How to exercise your rights**

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

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will use any personal information collected from you in connection with the verification of your request solely for the purposes of 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 cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

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

You can submit a maximum number of 2 requests over a period of 12 months.

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

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period. Only with regard to personal information collected on or after January 1, 2022, you have the right to request that we disclose information beyond the 12-month period, and we will provide them to you unless doing so proves impossible or would involve a disproportionate effort.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. 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 it.

### **Additional information about California privacy**

#### **Collection of personal information about California consumers aged 13 to 16**

We collect personal information of consumers between the age of 13 and 16 and won't sell or share their data personal information unless those consumers have opted in.

#### **Collection of personal information about California consumers below the age of 13**

We collect personal information of consumers below the age of 13 and won't sell or share their personal information unless their parents or guardians have opted in on behalf of those minors.

#### **We do not collect personal information about California consumers below the age of 16**

We do not knowingly collect personal information of consumers who are below the age of 16 nor do we sell or share it.

### **Further information for Virginia consumers**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller 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").

This section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the Commonwealth of Virginia, according to the ["Virginia Consumer Data Protection Act"](#) (the "VCDPA"), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the terms “personal data” (and “sensitive data”) as defined in the VCDPA.

## **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document.**

### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers, commercial information, biometric information, internet information, geolocation data, sensorial information, employment related information and inferred information

With your consent, we collect the following categories of sensitive data: movement activity, body measurements & indexes, sleeping activity, heart rate and other vital data, blood type, VAT Number, VAT Number, VAT Number, VAT Number, Precise location permission (continuous), Precise location permission (non-continuous), Biometric Data access permission, Health Data read permission, Health Data update permission , marital status, VAT Number, Tax ID, Social Security number (SSN), marital status, precise location, VAT Number and Tax ID

You can freely give, deny or withdraw your consent for the processing of sensitive data at any time using the contact details provided in this document or via the privacy choices link provided on this Website.

Please note that certain exceptions set forth in the VCDPA may apply, such as, but not limited to, when the collection and processing of sensitive data is necessary for the provision of a product or service specifically requested by you.

We will not collect additional categories of personal data without notifying you.

### **Why we process your personal data**

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

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a natural or legal person, public authority, agency, or body other than the consumer, controller, processor, or an affiliate of the processor or the controller" as defined by the VCDPA.

### **Sale of your personal data**

For our purposes, the word “sale” means any “exchange of personal data for monetary consideration by us to a third party“ as defined by the VCDPA.

Please note that according to the VCDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the VCDPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal information may be considered a sale under VCDPA.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

For our purposes, the word "targeted advertising" means "displaying advertisements to you where the advertisement is selected based on personal data obtained from your activities over time and across nonaffiliated websites or online applications to predict your preferences or interests" as defined by the VCDPA.

Please note that according to the VCDPA, targeted advertising does not include: "advertisements based on activities within a controller's own websites or online applications; advertisements based on the context of a consumer's current search query, visit to a website or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely for measuring or reporting advertising performance, reach, or frequency".

To find out more details on the processing of your personal data for targeted advertising purposes, you can read the section titled "Detailed information on the processing of Personal Data" within this document.

#### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

### **Your privacy rights under the Virginia Consumer Data Protection Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- **access personal data: the right to know.** You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- **correct inaccurate personal data.** You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- **request the deletion of your personal data.** You have the right to request that we delete any of your personal data.
- **obtain a copy of your personal data.** We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity — provided that this is technically feasible.
- **opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **non-discrimination.** We will not discriminate against you for exercising your rights under the VCDPA. This means that we will not, among other things, deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your consumer privacy rights. However, if you refuse to provide your personal data to us or ask us to delete or stop selling your personal data, and that personal data or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction. To the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if you have exercised your right to opt out, or our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

#### **How to exercise your rights**

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 need to know who you are.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

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

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

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.



Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 60 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to two requests per year. If your request is manifestly unfounded, excessive or repetitive, 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 Virginia privacy**

### **Profiling of Virginia consumers**

We perform automated processing of your personal data to evaluate, analyze, or predict personal aspects related to, for example, your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. Such profiling activity is done in furtherance of decisions that result in the provision or denial of, for example, financial or lending services, housing, insurance, education enrollment or opportunity, criminal justice, employment opportunities, healthcare services, or access to essential goods or services.

You always have the right to opt out from this kind of profiling activity. To fully exercise this right to opt out you can contact us at any time using the contact details provided in this document. To find out more about your rights and how to exercise them, you can consult the section of this document outlining your rights under the VCDPA.

### **We do not collect personal data about Virginia consumers below the age of 13**

We do not knowingly collect personal data of Virginia consumers who are below the age of 13 nor do we sell their data or process them for targeted advertising purposes.

## **Further information for Colorado consumers**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Website 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 (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Colorado, according to the “Colorado Privacy Act” (the “CPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the terms “personal data” (and “sensitive data”) as defined in the CPA.

### **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document.**

#### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers, commercial information, biometric information, internet information, geolocation data, sensorial information, employment related information and inferred information

With your consent, we collect the following categories of sensitive data: movement activity, body measurements & indexes, sleeping activity, heart rate and other vital data, blood type, VAT Number, VAT Number, VAT Number, VAT Number, Biometric Data access permission, Health Data read permission, Health Data update permission , marital status, VAT Number, Tax ID, Social Security number (SSN), marital status, VAT Number and Tax ID

You can freely give, deny or withdraw your consent for the processing of sensitive data at any time using the contact details provided in this document or via the privacy choices link provided on this Website.

Please note that certain exceptions set forth in the CPA may apply, such as, but not limited to, when the collection and processing of sensitive data is necessary for the provision of a product or service specifically requested by you.

We will not collect additional categories of personal data without notifying you.

### **Why we process your personal data**

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

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CPA.

### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CPA.

Please note that according to the CPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CPA.

Please note that according to the CPA, targeted advertising does not include: “advertisements directed to a consumer in response to the consumer's request for information or feedback; advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; or processing personal data solely to measure or report advertising frequency, performance or reach”.

### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

## **Universal opt-out mechanism: Global privacy control**

If you want to submit requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

## **Your privacy rights under the Colorado Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

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 need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

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

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

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to two requests per year.

## **Additional information about Colorado privacy**

### **We do not collect personal data about Colorado consumers below the age of 13**

We do not knowingly collect personal data of Colorado consumers who are below the age of 13 nor do we sell or process their data for targeted advertising purposes.

## Further information for Connecticut consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Website 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 (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Connecticut, according to “An Act Concerning Personal Data Privacy and Online Monitoring ” (also known as “The Connecticut Data Privacy Act” or the “CTDPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the terms “personal data” (and “sensitive data”) as defined in the CTDPA.

### Categories of personal data processed

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

#### Categories of personal data we collect

We have collected the following categories of personal data: identifiers, commercial information, biometric information, internet information, geolocation data, sensorial information, employment related information and inferred information

With your consent, we collect the following categories of sensitive data: movement activity, body measurements & indexes, sleeping activity, heart rate and other vital data, blood type, VAT Number, VAT Number, VAT Number, VAT Number, Precise location permission (continuous), Precise location permission (non-continuous), Biometric Data access permission, Health Data read permission, Health Data update permission , marital status, VAT Number, Tax ID, Social Security number (SSN), marital status, precise location, VAT Number and Tax ID

You can freely give, deny or withdraw your consent for the processing of sensitive data at any time using the contact details provided in this document or via the privacy choices link provided on this Website. In the event of withdrawal, we will stop processing the relevant data as soon as possible, but no later than 15 days after receiving your withdrawal request.

Please note that certain exceptions set forth in the CTDPA may apply, such as, but not limited to, when the collection and processing of sensitive data is necessary for the provision of a product or service specifically requested by you.

We will not collect additional categories of personal data without notifying you.

#### Why we process your personal data

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

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

#### How we use the data we collect: sharing of your personal data with third parties

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CTDPA.

#### Sale of your personal data

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CTDPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CTDPA.

Please note that according to the CTDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CTDPA may apply, such as, but not

limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

#### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

#### **Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across non affiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CTDPA.

Please note that according to the CTDPA, targeted advertising does not include: “advertisements based on activities within a controller's own web sites or online applications; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely to measure or report advertising frequency, performance or reach”.

#### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

#### **Universal opt-out mechanism: Global privacy control**

If you want to submit requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

#### **Your privacy rights under the Connecticut Data Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

## How to exercise your rights

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 need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

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

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

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to one request per year.

## Additional information about Connecticut privacy

### We do not collect personal data about Connecticut consumers below the age of 13

We do not knowingly collect personal data of Connecticut consumers who are below the age of 13 nor do we sell or process their data for targeted advertising purposes.

## Further information for Utah consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Website 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 (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Utah, according to the “Consumer Privacy Act” (the “UCPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the terms “personal data” (and “sensitive data”) as defined in the UCPA.

## Categories of personal data processed

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document.**

### Categories of personal data we collect

We have collected the following categories of personal data: identifiers, commercial information, biometric information, internet information, geolocation data, sensorial information, employment related information and inferred information

With your consent, we collect the following categories of sensitive data: movement activity, body measurements & indexes, sleeping activity, heart rate and other vital data, blood type, VAT Number, VAT Number, VAT Number, VAT Number, Precise location permission (continuous), Precise location permission (non-continuous), Biometric Data access permission, Health Data read permission, Health Data update permission, marital status, VAT Number, Tax ID, Social Security number (SSN), marital status, precise location, VAT Number and Tax ID

You can freely give, deny or withdraw your consent for the processing of sensitive data at any time using the contact details provided in this document or via the privacy choices link provided on this Website.

Please note that certain exceptions set forth in the UCPA may apply, such as, but not limited to, when the collection and processing of sensitive data is necessary for the provision of a product or service specifically requested by you.

We will not collect additional categories of personal data without notifying you.

### **Why we process your personal data**

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

### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person other than: the consumer, controller, or processor; or an affiliate or contractor of the controller or the processor" as defined by the UCPA.

### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the UCPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the UCPA.

Please note that according to the UCPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the UCPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by UCPA.

Please note that according to the UCPA, targeted advertising does not include: “advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to a web site or online application; advertisements directed to a consumer in response to the consumer's request for information, product, a service or feedback; or processing personal data solely to measure or report advertising performance, reach or frequency.”

### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

## **Your privacy rights under the Utah Consumer Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising or the sale of personal data.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

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 need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request. We may retain your email address to respond to your request.

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

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

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request.

We do not charge a fee to respond to your request, for up to one request per year.

### **Additional information about Utah privacy**

#### **We do not collect personal data about Utah consumers below the age of 13**

We do not knowingly collect personal data of Utah consumers who are below the age of 13 nor do we sell or process their data 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 Website 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 Website 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 Website and any third-party services may collect files that record interaction with this Website (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 Website 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.

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

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

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

## **The grounds on which we process your personal information**

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

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

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

## **Categories of personal information processed**

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

## **Why we process your personal information**

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

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

### **Your Brazilian privacy rights**

You have the right to:

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

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

### **How to file your request**

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

### **How and when we will respond to your request**

We will strive to promptly respond to your requests.

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

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

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

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

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

### **Transfer of personal information outside of Brazil permitted by the law**

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

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

### **Additional information for Users in Brazil**

#### **Transfer of personal information outside of Brazil based on contracts and other legal means**

We can transfer your personal information outside of the Brazilian territory provided that we are able to ensure that any further processing of your personal information will be in compliance with the principles and the rules established by the LGPD, and your rights are safeguarded.

To do so, we may use one of the following legal means:

- specific contractual clauses for each given transfer. This means that we will enter into an agreement with the recipient of your personal information to make sure that such transfers meet the requirements explained above. Such an agreement shall be subject to the ANPD's prior verification;
- standard contractual clauses. These clauses set terms and conditions for the transfer of personal information and are adopted by the ANPD;
- global corporate clauses. These clauses set terms and conditions for the transfer of personal information within an organisation and, before they come into force, are subject to the ANPD's prior verification;
- seals of approval, certificates and codes of conduct regularly issued by the ANPD. These legal instruments allow us to transfer your personal information provided that we abide by their rules. They are subject to the previous approval of the ANPD.

### **Transfer of personal information outside of Brazil based on your consent**

We can transfer your personal information outside of the Brazilian territory if you consent to such transfer.

When we ask for your consent, we'll make sure to provide all the information that you need to make an educated decision and to understand the implications and consequences of providing or denying your consent.

Such information will be given in clear and plain language and in such a way that you'll be able to clearly distinguish these requests from other consent requests that we may possibly ask.

**You may withdraw your consent at any time.**

### **Transfer of personal information outside of Brazil to countries that guarantee the same protection standards as LGPD**

We can transfer your personal information outside of the Brazilian territory, if the destination country, or the international organization which receives the personal information, provides an adequate level of protection of the personal information according to the ANPD.

The ANPD authorizes such transfers whenever it considers that country to possess and provide personal information protection standards comparable to those set forth by the LGPD, having taken into account the following:

- the general and sectoral rules of the legislation in force in the country of destination or in the international organization;
- the nature of the personal information subject to the transfer;
- the compliance with the general principles on the protection of the personal information and on the rights of the individuals as set forth in the LGPD;
- the adoption of suitable security measures;
- the existence of judicial and institutional guarantees for the respect of personal information protection rights; and
- any other pertinent circumstance related to the relevant transfer.

## **Definitions and legal references**

### **Personal Data (or Data)**

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

### **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, 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 Website 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 Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

**This Website (or this Application)**

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

**Service**

The service provided by this Website as described in the relative terms (if available) and on this site/application.

**European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

**Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

**Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

**Read only access**

Read all resources and their metadata—no write operations.

**Full access**

Full access to the account, including permanent deletion of threads and messages.

**Read metadata**

Read resources metadata including labels, history records, and email message headers, but not the message body or attachments.

**Modify**

All read/write operations except immediate, permanent deletion of threads and messages, bypassing Trash.

**Insert and import**

Insert and import messages only.

**Compose**

Create, read, update, and delete drafts. Send messages and drafts.

**Basic settings management**

Manage basic mail settings.

**Sensitive settings management**

Manage sensitive mail settings, including forwarding rules and aliases.

### **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

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

Latest update: March 28, 2024