

# Privacy Policy of [www.nauticabasile.it](http://www.nauticabasile.it)

This Website collects some Personal Data from its Users.

## Owner and Data Controller

Nautica Basile di Basile Alessandro  
Via Antonio Gramsci, 19/21  
89015 - Palmi (RC)  
Italy

**Owner contact email:** [info@nauticabasile.it](mailto:info@nauticabasile.it)

## Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Trackers; Usage Data; number of Users; session statistics; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; phone number; email address; first name; last name; profession; county; state; country; ZIP/Postal code; gender; date of birth; city; physical address; company name; website; VAT Number; fax number; various types of Data; Tax ID; field of activity; User ID; number of employees; username; profile picture; geography/region; password; device information; Data communicated while using the service; payment info; billing address; shipping address; purchase history; geographic position; language; picture; screenshots; workplace; session duration; scroll-to-page interactions; time zone; interaction events; diagnostic events; page events; custom events; layout details; positional information; Full access; Read only access; Read metadata; Modify; Insert and import; Compose; Basic settings management; Sensitive settings management; prefix ; house number; Universally unique identifier (UUID); unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

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: Analytics, Traffic optimization and distribution, Displaying content from external platforms, SPAM protection, Tag Management, Advertising, Contacting the User, Managing contacts and sending messages, Access to third-party accounts, Registration and authentication, Handling payments, Connecting Data, User database management, Handling activities related to productivity, Managing data collection and online surveys, Heat mapping and session recording, Hosting and backend infrastructure, Interaction with live chat platforms, Interaction with online survey platforms, Location-based interactions, Collection of privacy-related preferences, Registration and authentication provided directly by this Website, Remarketing and behavioral targeting and Data transfer outside the EU.

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

## **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.

### **Business Management API**

Read and write with Business Management API.

### **Chat**

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

### **Contact email**

Access the User's contact email address.

### **Current City**

Provides access to the User's current location.

### **Email**

Provides access to the User's primary email address.

### **Insights**

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

## **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.

## **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.

#### **Facebook account access (Meta Platforms, Inc.)**

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

Permissions asked: About Me; Business Management API; Chat; Contact email; Current City; Email; Insights; Whatsapp business management.

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

#### **Stripe account access (Stripe Payments Europe, Limited)**

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

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

Place of processing: European Union .

## **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 for identifying Users, behavioral retargeting i.e. displaying ads tailored to the User's interests and behavior, or to measure ads performance. 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.

#### **Meta ads conversion tracking (Meta pixel) (Meta Platforms Ireland Limited)**

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

Personal Data processed: Trackers; Usage Data.

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

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

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

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

#### **eBay (advertising)**

eBay (advertising) is an advertising service provided by eBay Inc, eBay (UK) Limited, eBay Canada Limited, eBay GmbH, eBay Services S.à r.l. or by eBay Singapore Services Private Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#); United Kingdom – [Privacy Policy](#); Canada – [Privacy Policy](#); European Union – [Privacy Policy](#); Italy – [Privacy Policy](#); France – [Privacy Policy](#); Spain – [Privacy Policy](#); India – [Privacy Policy](#).

### **Microsoft Advertising (Microsoft Corporation)**

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Trackers; Usage Data.

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

### **Meta Lookalike Audience**

Meta Lookalike Audience is an advertising and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that uses Data collected through Meta's Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the basis of their past use of this Website or engagement with relevant content across Meta's apps and services. On the basis of these Data, personalized ads will be shown to Users suggested by Meta Lookalike Audience.

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

Personal Data processed: Trackers; Usage Data.

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

### **Google Ads conversion tracking**

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on this Website.

Personal Data processed: Trackers; Usage Data.

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

### **Microsoft Advertising Universal Event Tracking (Microsoft Corporation)**

Microsoft Advertising Universal Event Tracking is an analytics service provided by Microsoft Corporation that connects data from the Microsoft Advertising network with actions performed on this Website.

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

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

## **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: Trackers; Usage Data.

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

### **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited (“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: Ireland – [Privacy Policy](#) – [Opt Out](#).

### **Meta Events Manager (Meta Platforms Ireland Limited)**

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

Personal Data processed: Trackers; Usage Data.

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

### **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](#).

### **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](#).

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

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

Personal Data processed: Trackers; Usage Data.

### **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: Trackers; Usage Data.

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

### **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; Trackers.

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

### **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: Trackers.

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

## **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; screenshots; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

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

## **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.

### **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.

### **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.

## **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 Ireland Limited)**

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

Personal Data processed: Trackers; Usage Data.

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

### **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](#).

## **Handling activities related to productivity**

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

### **Gmail**

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; 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](#).

## **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.

### **Amazon Payments (Amazon)**

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

Personal Data processed: billing address; email address; first name; last name; password; payment info; phone number; purchase history; shipping address; Trackers; Usage Data; username; various types of Data as specified in the privacy policy of the service.

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

### **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](#).

### **Android Pay (Google Ireland Limited)**



Android Pay is a payment service provided by Google Ireland Limited, 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: Ireland – [Privacy Policy](#).

### **Stripe (Stripe Payments Europe, Limited)**

Stripe is a payment service provided by Stripe Payments Europe, Limited.

Personal Data processed: billing address; email address; first name; last name; payment info; purchase history; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

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

### **Google Pay (Google Ireland Limited)**

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

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: Ireland – [Privacy Policy](#).

### **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: company name; first name; last name; payment info; physical address.

### **PayPal (PayPal Inc.)**

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

Personal Data processed: billing address; device information; email address; first name; last name; password; payment info; phone number; purchase history; Trackers; Usage Data; username; various types of Data as specified in the privacy policy of the service.

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

### **Heat mapping and session recording**

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

### **Microsoft Clarity (Microsoft Corporation)**

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation.

Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: clicks; country; custom events; device information; diagnostic events; interaction events; layout details; mouse movements; page events; positional information; scroll-to-page interactions; session duration; time zone; Trackers; Usage Data.

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

### **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.

### **Google BigQuery**

Google BigQuery is a hosting and backend service provided by Google LLC or by Google Ireland Limited, 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](#).

### **Interaction with live chat platforms**

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Website, in order to contact and be contacted by this Website's support service.

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

### **Facebook Messenger Customer Chat**

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

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

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

### **Interaction with online survey platforms**

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

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

### **Customerly Survey Widget (Customerly Ltd.)**

The Customerly Survey Widget is a service for interacting with the Customerly online survey platform provided by Customerly Ltd.

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

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

### **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.

### **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.

### **Customerly E-mail Marketing (Customerly Ltd.)**

Customerly E-mail Marketing is an email address management and message sending service provided by Customerly Ltd.

Personal Data processed: company name; country; date of birth; email address; first name; gender; last name; phone number; physical address; profession; Trackers; Usage Data; username; various types of Data; VAT Number.

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

### **Brevo email (SendinBlue SAS)**

Brevo email is an email address management and message-sending service provided by SendinBlue SAS.

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

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

### **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](#).

## **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.

### **Customerly Survey (Customerly Ltd.)**

Customerly Survey is a survey builder and data collection platform provided by Customerly Ltd.

Personal Data processed: company name; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; last name; number of employees; password; phone number; physical address; profession; state; Tax ID; Trackers; Usage Data; username; VAT Number; website.

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

## **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.

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

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

Personal Data processed: city; country; date of birth; email address; first name; geography/region; last name; password; phone number; profile picture; User ID.

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

### **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](#).

### **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](#).

### **Google OAuth (Google Ireland Limited)**

Google OAuth is a registration and authentication service provided by Google Ireland Limited 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: Ireland – [Privacy Policy](#).

### **Log In with PayPal (PayPal Inc.)**

Log In with PayPal is a registration and authentication service provided by PayPal Inc. and is connected to the PayPal network.

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](#).

### **Login with Amazon (Amazon)**

Login with Amazon is a registration and authentication service provided by Amazon.com, Inc.

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

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

### **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](#).

### **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: billing address; city; company name; country; county; date of birth; email address; first name; gender; house number; language; last name; password; phone number; physical address; prefix ; profession; state; Tax ID; Trackers; Usage Data; User ID; username; various types of Data; VAT Number; ZIP/Postal code.

## **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.

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

### **Facebook Remarketing**

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

Personal Data processed: Trackers; Usage Data.

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

### **Google Signals**

This Website uses Google Signals, a feature of Google Analytics, which will associate the visitation information that it collects from this Website with Google information from accounts of signed-in Google-account users who have consented to this association for the purpose of ads personalization. This Google information may include User location, search history, YouTube history and Data from sites that partner with Google – and is used to provide aggregated and anonymized insights into Users' cross device behaviors.

If a User falls under the described association, they [may access and/or delete such Data via My Activity](#) provided by Google.

Personal Data processed: Trackers; Usage Data.

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

### **Meta Custom Audience**

Meta Custom Audience is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Website with the Meta Audience Network.

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

Personal Data processed: email address; Trackers.

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

### **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](#).

### **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: Trackers; Usage Data.

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

## **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.

### **Google reCAPTCHA (Google Ireland Limited)**

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited. 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: Ireland – [Privacy Policy](#).

## **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 Ireland Limited)**

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Trackers; Usage Data.

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

## **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: Trackers; various types of Data as specified in the privacy policy of the service.

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

## **User database management**

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Website, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Website.

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

### **Customerly (Customerly Ltd.)**

Customerly is a User database management service provided by Customerly Ltd. Customerly can also be used as a medium for communications, either through email, or through messages within this Website.

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

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

### **Brevo marketing automation (SendinBlue SAS)**

Brevo marketing automation is a User database management service provided by SendinBlue SAS.

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

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

## **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.

### **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.

### **Preference Cookies**

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

### **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.

### **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).

### **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.

## **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 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.

### **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.

## **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.

## **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.

### **Full access**

Full access to the account, including permanent deletion of threads and messages.

**Read only access**

Read all resources and their metadata—no write operations.

**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 policy relates solely to this Website, if not stated otherwise within this document.

Latest update: March 08, 2024