

Privacy Policy of Congregation Tifereth Israel

This Website collects some Personal Data from its Users.

Owner and Data Controller

Congregation Tifereth Israel

40 Hill Street
Glen Cove, NY 11542
United States

Owner contact email: webmaster@ctionline.org

Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: first name; last name; physical address; company name; country; date of birth; email address; gender; phone number; Trackers; Usage Data; number of Users; session statistics; various types of Data; payment info; billing address; purchase history; geographic position; precise location; password; User ID; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; interaction events; page views; referral URL; device information; operating systems; browser information.

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: Access to third-party accounts, Analytics, Backup saving and management, Collection of privacy-related preferences, Contacting the User, Data transfer outside of the UK, Data transfer outside the EU, Displaying content from external platforms, Handling payments, Hosting and backend infrastructure, Infrastructure monitoring, Interaction with external social networks and platforms, Location-based interactions, Registration and authentication provided directly by this Website, Traffic optimization and distribution, Spam and bots protection and Social features.

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

Detailed information on the processing of Personal Data

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

Access to third-party accounts

This type of service allows 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.

Mailchimp account access (Intuit Inc.)

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

Personal Data processed: company name; country; date of birth; email address; first name; gender; last name; phone number; physical address.

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

ShulCloud Privacy Policy for CTI Membership Services

ShulCloud Privacy Policy

Effective Date: January 1, 2023

Shulcloud, LLC and its affiliates and subsidiaries (“Company,” “we,” “us” or “our”) recognizes the importance of protecting the privacy of our online visitors. The following privacy policy (“Privacy Policy”) describes the way we handle information learned about you from your visits to all of the websites and mobile applications we operate (collectively, the “Site”).

PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY. By accessing the Site and/or submitting information to or through the Site, you accept the terms of this Privacy Policy and consent to our collection, use, disclosure and retention of your information as described in this Privacy Policy.

We also act as processors or service providers for our customers and maintain, store and/or process the personal information of our customer’s constituents and clients on our customers’ behalf when our customers use our products. Such information above is not subject to this Privacy Policy and is instead subject to the privacy policies of our customers.

If you are a resident of the European Union (“EU”), United Kingdom (“UK”) or Switzerland, you may be afforded additional rights under these laws. Please visit our EU/UK/Switzerland Supplemental Privacy Notice at [URL] for more information on such rights and how to exercise such rights.

If you are a resident of Brazil, you may be afforded additional rights under these laws. Please visit our Brazil Supplemental Privacy Notice at [URL] for more information on such rights and how to exercise such rights.

Personal Information

Company collects personally identifiable information from you, which may include:

- Name
- Address
- Telephone number
- Email address
- Organization/company name
- Organization/company website
- Account credentials (i.e., username and password)
- Financial information

Additionally, we may collect any personal information you provide us in communications you send or provide when you interact with any communications tools on the Site.

The information described above is collected and stored electronically when you access/visit the Site, purchase our products, use our products, request a demo of our products or sign up for a free trial, create an account with us, sign up to receive our newsletters and/or marketing communications, sign up for our webinars/events/forums or contact us.

Information Collected Automatically

Information about your computer hardware and software may automatically be collected by Company when you use the Site. This information may include:

- IP address
- Browser type
- Type of operating system
- Device type
- Unique device identifier
- Internet service provider
- Language preference
- Access times and dates
- Geographic location
- Referring website addresses
- Browsing history
- Search queries
- Other technical information such as protocol status and substatus, bytes sent and received, and server information

Actions you take while visiting the Site

This information is used by us for our business purposes, including without limitation for the operation and improvement of the Site, for technical troubleshooting, to maintain quality of the Site and to provide general statistics regarding use of the Site.

Cookies and Other Information Collection Tools

What are cookies? A cookie is a small file containing a string of characters that is sent to your computer when you visit a website or use an online service. When you visit the website or use the service again, the cookie allows that website or online service to recognize your browser or device. Cookies may store unique identifiers, user preferences and other information.

Duration of Cookies. We may use “session cookies” or “persistent cookies.” Session cookies are temporary and expire once you close your browser or once your session ends. Persistent cookies remain on your device for much longer or until you or your browser erase them. Persistent cookies have varying durations that are dependent on their expiration date.

What types of cookies do we use? Company uses:

- **Necessary Cookies.** These cookies are necessary for you to browse the Site and use its features, such as accessing secure areas of the Site. Without these cookies, certain aspects of the Site may not be available to you.
- **Preferences Cookies.** These cookies collect information about how you have used the Site in the past and allow the Site to remember the choices you have made. These cookies allow us to improve how the Site works for you and tailor the Site to your preferences.
- **Analytics Cookies.** These cookies collect information about how you use the Site, such as which pages you most often visit on the Site, the time you spend on the Site, which links you click on, and any issues encountered. These cookies help us understand how visitors interact with the Site. All information collected is aggregated and do not identify you.
- **Marketing Cookies.** These cookies track your online activity to help deliver advertisements that are relevant to you and your interests and measure the effectiveness of the advertising campaigns. They also limit how many times you see a certain advertisement. We may share the information collected through these cookies with others, such as advertisers.

Why do we use them? Cookies help us improve the Site by providing us with information about which parts of the Site are most popular, what actions are taken by users and what content is viewed, enabling us to analyze technical and navigational information about the Site, and helping us to detect and prevent fraud. We also use cookies and other data collection tools (such as web beacons, pixels and embedded scripts) to help improve your experience with the Site. For example, we use Google Analytics to help analyze how users use the Site. These tools use cookies to collect standard Internet log information and visitor behavior information in an anonymous form. The information generated by the cookie about your use of the Site (including IP address) is transmitted to our data collection tool service providers. This information is then used by us to evaluate visitors’ use of the Site and to compile statistical reports on website activity for Company. If you would like to opt-out from the use of your information by Google analytics, you may use Google Analytics opt-out browser add-on designed for this purpose.

How do I control cookies? Web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to manage and delete cookies, visit www.allaboutcookies.org. Some web browsers provide settings that allow a user to reject cookies or to alert a user when a cookie is placed on the user’s computer, tablet or mobile device. Most mobile devices also offer settings to reject mobile device identifiers. Although users are not required to accept cookies or mobile device identifiers, blocking or rejecting them may prevent access to some features available through the Site.

Interest Based Advertising

We may collect information about your online activities on our Site to provide you with advertising about products and services tailored to your individual interests. You may see certain ads on other websites because we work with advertising partners (including advertising networks) to engage in remarketing and retargeting activities. Our advertising partners allow us to target

our messaging to users through demographic, interest-based and contextual means. These partners may track your online activities over time and across websites, including our Site, by collecting information through automated means, including through the use of third-party cookies and web beacons. The information our advertising partners may collect includes data about your visits to websites that participate in the relevant advertising networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Site and on third-party websites that participate in the ad networks.

Provided that a digital advertising services company participates in industry-developed programs designed to provide consumers choices about whether to receive targeted advertising, you may opt out of ad network interest-based advertising generally through the Network Advertising Initiative website or by visiting <http://www.aboutads.info/choices/> (web-based advertising) or <http://www.aboutads.info/appchoices> (for mobile advertising). To learn more, please visit the websites operated by the Network Advertising Initiative and Digital Advertising Alliance at www.networkadvertising.org/choices. If we use such digital advertising service providers in our marketing efforts, opting-out using those tools does not mean that you will stop receiving ads from us. It means that you still stop receiving ads from us that have been targeted to you based on your visits and browsing activity across websites over time.

How Information is Used

We may use the information we collect for any of the following purposes:

- to provide the Site to you and to improve the Site;
- to provide, operate, improve, and personalize the products and services we offer, and to give each user a more consistent and personalized experience when interacting with us;
- to register your account;
- to determine trends in consumption of our products and determine where our products may be in demand;
- to provide you with information about products and services that we may provide that we think may be of interest to you;
- to help deliver advertisements that are relevant to you and your interests and measure the effectiveness of our advertising campaigns;
- to provide you with updates about our products and services and with transactional information;
- for customer service and/or support, security (including for authentication purposes), to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Site;
- for analytics purposes;
- to fulfil your requests, such as those related to ordering and payment;
- to communicate with you, including through the chat function on the Site;
- to enforce our Privacy Policy or other applicable policies;
- to comply with applicable laws or respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process;
- to enforce our rights, protect our property or protect the rights, property or safety of others;

- as needed to support external auditing, compliance and corporate governance functions.

Sharing of Information

With Third Party Service Providers Performing Services on Our Behalf. We may share your personal information with our service providers to perform the functions for which we engage them. For example, we may use third parties to host the Site or assist us in providing functionality on the Site, provide analytics on the Site, provide a chat function on the Site, provide marketing and advertising services for us, to send out emails on our behalf or process payments.

With Our Affiliates and Subsidiaries. We may share your information with our family of brands and corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures or companies under common control) for our internal business purposes. However, if we do so, their use and disclosure of your personal information will be subject to this Privacy Policy.

For Legal Purposes. We also may share information that we collect from users as needed to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose personal information as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process. We may also share personal information as required to pursue available remedies or limit damages we may sustain.

Changes of Control. We reserve the right to transfer or assign the information that we have collected from users in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Company does not share your personal information with third parties for those third parties' direct marketing purposes.

Your Rights and Choices

By providing your phone number and clicking submit online, you agree to our Privacy Policy and authorize us to make or initiate sales calls, text messages and prerecorded voicemails to that phone number using an automated system. Your agreement is not a condition of purchasing any products, goods or services and you may elect to do business with us over the phone. Message & data rates may apply.

You may opt out of receiving promotional e-mails and text messages from us by following the unsubscribe instructions provided in any such messages. Please note that if you opt out of receiving promotional messages from us, this does not impact other transactional and administrative messages which you will continue to receive (such as emails relating to billing and payment information or changes to this Privacy Policy). If you have registered for an account with us, you may delete the account at any time by contacting us at legal@togetherwork.com.

If you have an account with us, you may access or modify some of your information and/or modify your preferences through your account or by contacting us at legal@togetherwork.com

Australia Residents

If you are an Australian resident, you have the rights to request access to and correct your personal information under Australia's Privacy Act 1988 ("Privacy Act"). You may access or modify your information through your account or by contacting us at legal@togetherwork.com.

If you have reason to believe that we have not complied with our obligations under the Privacy Act in relation to your personal information, please contact us at legal@togetherwork.com. We will investigate all complaints and respond to you as soon as practicable.

We are based in the U.S. If you are accessing the Site or we collect your information in the course of providing our products and services, the information may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of Australia. Your use of the Site or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in the U.S. and other jurisdictions as set out in this Privacy Policy.

Links to External Websites / Online Services

Our Site may contain links to third-party websites and/or online services. Any access to and use of such third-party websites and/or online services is not governed by this Privacy Policy, but is instead governed by the privacy policies of those third parties, and we are not responsible for the information practices of such third-party websites and/or online services.

Some aspects of the Site may allow you to interface with social media, such as Facebook or Google Plus. We will attempt to identify these aspects of the Site to you, for example, by identifying them with the applicable third-party logos or trade names. By using these interfaces, you will allow us to access information about you from those other online services, including information and other content that you submit to those online services. If you interface with the Site through your social media account, we may contact you or enable you to share your experience and content via your social media account, which information may be publicly viewed by other users of those services. For a description on how such social media services and other third-party platforms, plug-ins, integrations, and applications handle your information, please refer to their respective privacy policies and terms of use, which may permit you to modify your privacy settings with that service or platform.

Security

Company uses reasonable security measures designed to prevent unauthorized intrusion to the Site and the alteration, acquisition or misuse of personal information. However, the security of information transmitted through the Internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the Internet or for changes to or losses of data. Users of the Site are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our Site. In order to protect us, you and your data, we may suspend your use of the Site, without notice if any breach of security is suspected. Access to and use of password protected and/or secure areas of the Site are restricted to authorized users only. Unauthorized access to such areas is prohibited.

Do Not Track

Our Site does not currently take any action when it receives a Do Not Track request. Do Not Track is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on Do Not Track, visit www.donottrack.us.

Children

We do not knowingly collect or maintain personal information from any person under the age of eighteen. No parts of our Site are directed to or designed to attract anyone under the age of eighteen.

Contact Information; Questions and Changes in Information

If you have any questions regarding this Privacy Policy or to request changes to your personal information, please contact us at legal@togetherwork.com.

Notification of Changes

Any changes to our Privacy Policy will be posted to this page so users are always aware of the information we collect and how we use it. Accordingly, please refer back to this Privacy Policy frequently as it may change.

This processing constitutes:

- a Sale in California

Analytics

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

Google Analytics 4 (Google LLC)

Google Analytics 4 is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this 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](#).

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

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

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

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

This processing constitutes:

- a Sale in California

Backup saving and management

This type of service allows the Owner to save and manage backups of this Website on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to this Website.

Amazon Glacier (Amazon)

Amazon Glacier is a service to save and manage backups provided by Amazon Web Services Inc.

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

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

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

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 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](#).

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

Contacting the User

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: email address; first name; last name; various types of Data.

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

This processing constitutes:

- a Sale in California

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: email address; first name; last name.

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

This processing constitutes:

- a Sale in the United States

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 Maps widget (Google LLC)

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

Personal Data processed: Usage Data.

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

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

This processing constitutes:

- a Sale in California

YouTube video widget (Google LLC)

YouTube is a video content visualization service provided by Google LLC 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 in California

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.

Stripe (Stripe, Inc.)

Stripe is a payment service provided by Stripe, Inc.

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

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

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

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.

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

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

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

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

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

accessiBe accessWidget (accessiBe Ltd.)

accessiBe accessWidget is a service that helps websites to comply with accessibility standards and is provided by accessiBe Ltd.

Personal Data processed: browser information; clicks; device information; interaction events; operating systems; page views; referral URL.

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

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

This processing constitutes:

- a Sharing in California

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.

Uptime Robot (Buzpark Bilisim Tarim Urunleri Sanayi Tic. Ltd. Sti.)

Uptime Robot is a monitoring service provided by Buzpark Bilisim Tarim Urunleri Sanayi Tic. Ltd. Sti.

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

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

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

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 (Meta Platforms, Inc.)

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

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a Sale in the United States

X Post button and social widgets (X Corp.)

The X Post button and social widgets are services allowing interaction with the X social network provided by X Corp.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a Sale in California

YouTube button and social widgets (Google LLC)

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

Personal Data processed: Usage Data.

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

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

This processing constitutes:

- a Sale in California

Location-based interactions

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: geographic position; precise location.

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

This processing constitutes:

- a Sharing in California

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: email address; first name; last name; password; User ID.

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

Social features

Inviting and suggesting friends (this Website)

This Website may use the Personal Data provided to allow Users to invite their friends - for example through the address book, if access has been provided - and to suggest friends or connections inside it.

Personal Data processed: various types of Data.

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

This processing constitutes:

- a Sale in California

Spam and bots protection

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

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC.
The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

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

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](#).

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

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.

Sucuri CloudProxy (Sucuri, Inc.)

Sucuri CloudProxy is a traffic optimization and distribution service provided by Sucuri, Inc.
The way Sucuri CloudProxy 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: 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.

This processing constitutes:

- a Sale in California

Further information about the processing of Personal Data

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.

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.

Profiling of Connecticut 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 may 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 CTDPA.

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.

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.

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.

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.

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.

Cookie Policy

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

Further Information for Users in the European Union

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

Legal basis of processing

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

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

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

Further information about retention time

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

Therefore:

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

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

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

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

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

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

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

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

Details about the right to object to processing

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

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

How to exercise these rights

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

Transfer of Personal Data outside of the European Union

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

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 the United States

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this 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”).

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

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

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

Notice at collection

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

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

- ►

Identifiers

- ►

Commercial information

- ►

Internet or other electronic network activity information

- ►

Geolocation data

- ►

Inferences drawn from other personal information

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

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

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

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

What are the sources of the Personal Information we collect?

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

Your privacy rights under US state laws

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

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

Additional rights for Users residing in California

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

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

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

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

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

Additional rights for users residing in Utah and Iowa

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

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

How to exercise your privacy rights under US state laws

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

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

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

How to exercise your rights to opt out

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

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

frictionless manner.

How and when we are expected to handle your request

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

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

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

Additional information for Users in the United States

Profiling of Colorado 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 may 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 CPA.

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.

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.

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) / Personal Information (or Information)

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

Sensitive Personal Information

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

Usage Data

Information collected automatically through this 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.

Sale

Sale means any exchange of Personal Information by the Owner to **a third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

Sharing

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioral advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

Targeted advertising

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

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

Latest update: March 15, 2024