# Privacy Policy of dispatcheseurope.com/

This Application collects some Personal Data from its Users.

# **Owner and Data Controller**

Dispatches Media, Inc.

Owner contact email: cheryl@dispatcheseurope.com

# **Types of Data collected**

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies; Usage Data; email address; first name; last name; country; city; various types of Data; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Data communicated while using the service; Data communicated in order to use the Service; password; profile picture; number of Users; device information; session statistics; latitude (of city); longitude (of city); session duration; scroll-to-page interactions; time zone; mouse movements; interaction events; diagnostic events; page events; custom events; layout details; positional 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 Application. Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service

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

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

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

# Mode and place of processing the Data

# Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

# **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

# **Retention time**

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

# The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Advertising, Analytics, Contacting the User, Displaying content from external platforms, Interaction with external social networks and platforms, Managing contacts and sending messages, Remarketing and behavioral targeting, Data transfer outside the EU, Content commenting, Interaction with data collection platforms and other third parties, Platform services and hosting, Managing landing and invitation pages, Tag Management, Registration and authentication, Interaction with live chat platforms, Access to third-party accounts, Registration and authentication provided directly by this Application, Traffic optimization and distribution, Handling productivity related activity and Heat mapping and session recording.

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 Application

This Application 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 Application 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 <u>Facebook permissions documentation</u> and to the <u>Facebook privacy policy</u>.

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.

### Likes

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

# **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 Application 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 (this Application)

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

Permissions asked: Likes.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: inferences drawn from other personal information.

This processing constitutes:

## Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.

Services of this kind usually 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.

### Google AdSense (Google Inc.)

Google AdSense is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. This service uses the "DoubleClick" Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

In order to understand Google's use of data, consult Google's partner policy.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – <u>Privacy Policy</u> – <u>Opt Out</u>.

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

This processing constitutes:

- a Sale in California
- a Sharing in California

# Google Ad Manager (Google Inc.)

Google Ad Manager is an advertising service provided by Google LLC that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with. In order to opt out from being tracked by various advertising networks, Users may make use of <a href="Youronlinechoices">Youronlinechoices</a>. In order to understand Google's use of data, consult <a href="Google's partner policy">Google's partner policy</a>.

This service uses the "DoubleClick" Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered. Users may decide to disable all the DoubleClick Cookies by clicking on: <a href="https://www.google.com/settings/ads/onweb/optout?hl=en">www.google.com/settings/ads/onweb/optout?hl=en</a>.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

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

This processing constitutes:

- a Sale in California
- a Sharing in California

### Google Ads conversion tracking (Google LLC)

Google Ads conversion tracking is an analytics service provided by Google LLC that connects data from the Google Ads advertising network with actions performed on this Application.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

#### Facebook Audience Network (Facebook, Inc.)

Facebook Audience Network is an advertising service provided by Facebook, Inc. **In order to understand Facebook's use of Data, consult <u>Facebook's data policy.</u>** 

This Application may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Facebook Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the <u>Facebook ad settings</u>.

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

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

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

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

This processing constitutes:

- a Sale in California
- · a Sharing in California

### Facebook Lookalike Audience (Facebook, Inc.)

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Facebook, Inc. that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of this Application or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this opt-out page.

Personal Data processed: Cookies; 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
- a Sharing in California

### Ezoic (Ezoic Inc.)

Ezoic is an advertising service provided by Ezoic Inc.

Personal Data processed: Cookies; 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
- a Sharing in California

#### **Ezoic Inc**

Ezoic's principal activities are:

Website analytics Website personalization Website hosting

Their privacy polic is here.

This processing constitutes:

- a Sale in California
- a Sharing 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 (Universal Analytics) (Google Inc.)

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 Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – <u>Privacy Policy</u> – <u>Opt Out</u>.

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

## Wordpress Stats (Automattic Inc.)

Wordpress Stats is an analytics service provided by Automattic Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – 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

# Analytics collected directly (this Application)

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

Personal Data processed: Cookies; Usage Data.

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

This processing constitutes:

# Facebook Analytics for Apps (Facebook, Inc.)

Facebook Analytics for Apps is an analytics service provided by Facebook, Inc.

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

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in California

# Google Analytics Demographics and Interests reports (Google LLC)

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

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

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

Place of processing: United States – Privacy Policy – Opt Out.

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

This processing constitutes:

• a Sale in California

### Google Analytics Advertising Reporting Features (Google LLC)

Google Analytics on this Application has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Cookies; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy – Opt Out.

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

This processing constitutes:

• a Sale in California

### YouTube Analytics and Reporting API

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

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

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the <u>Network Advertising Initiative opt-out page</u>.

Personal Data processed: Data communicated while using the service.

Place of processing: United States – Privacy Policy – Opt out; Ireland – Privacy Policy – Opt out.

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

This processing constitutes:

• a Sale in California

## 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 Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. 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.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

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

• a Sale in California

### **Google Analytics 4**

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

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

In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting <u>Google's official documentation</u>.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy – Opt Out.

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

This processing constitutes:

• a Sale in California

# **Contacting the User**

### **Mailing List or Newsletter (This Application)**

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data processed: city; Cookies; country; email address; first name; last name.

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

This processing constitutes:

 a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana

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

By filling in the contact form with their Data, the User authorizes this Application 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.

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

This processing constitutes:

# **Content commenting**

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

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

### Facebook Comments (Facebook, Inc.)

Facebook Comments is a content commenting service provided by Facebook, Inc. enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

### Data transfer outside the EU

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

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

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

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

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

Personal Data processed: various types of Data.

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

This processing constitutes:

### Data transfer abroad based on consent (this Application)

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

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

Personal Data processed: various types of Data.

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

This processing constitutes:

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

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

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

Personal Data processed: various types of Data.

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

This processing constitutes:

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

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

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

Personal Data processed: various types of Data.

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

This processing constitutes:

# **Displaying content from external platforms**

This type of services allows you to view content hosted on external platforms directly from the pages of this Application 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 Programmable Search Engine (Google Inc.)**

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

Personal Data processed: Cookies; Usage Data.

Place of processing: US – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

## Instagram widget (Instagram, Inc.)

Instagram is an image visualization service provided by Instagram, Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – 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 Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

### **Gravatar (Automattic Inc.)**

Gravatar is an image visualization service provided by Automattic Inc. that allows this Application to incorporate content of this kind on its pages.

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

Personal Data processed: email address; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

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

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

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

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

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

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in California

# YouTube video widget without cookies

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages. This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on this Application unless they play the video.

Personal Data processed: Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

### YouTube IFrame Player

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

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

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the <a href="Network Advertising Initiative opt-out page">Network Advertising Initiative opt-out page</a>.

Personal Data processed: Data communicated in order to use the Service; Data communicated while using the service.

Place of processing: United States – Privacy Policy – Opt out; Ireland – Privacy Policy – Opt out.

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

This processing constitutes:

• a Sale in California

### Google Site Search with AdSense

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

Google Site Search may display AdSense advertisements. For details of which data are collected, please refer to the privacy policy of this service.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

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

This processing constitutes:

• a Sale in California

# Handling productivity related activity

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

### **Google Workspace**

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

Personal Data processed: email address; first name; last name; password; profile picture.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: identifiers; audio, electronic, visual, thermal, olfactory, or similar information.

This processing constitutes:

• a Sale in California

# Heat mapping and session recording

Heat mapping services are used to display the areas of this Application 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: 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 – <u>Privacy Policy</u>; Brazil – <u>Privacy Policy</u>; South Africa – <u>Privacy Policy</u>; Australia – <u>Privacy Policy</u>; Japan – <u>Privacy Policy</u>; Canada – <u>Privacy Policy</u>; Korea, Republic of – <u>Privacy Policy</u>; India – <u>Privacy Policy</u>; Switzerland – <u>Privacy Policy</u>; United Arab Emirates – <u>Privacy Policy</u>; Germany – <u>Privacy Policy</u>; United Kingdom – <u>Privacy Policy</u>; France – <u>Privacy Policy</u>; Netherlands – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

# Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Application for the purpose of saving and reusing data.

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

## Mailchimp widget (The Rocket Science Group LLC)

The Mailchimp widget is a service for interacting with the Mailchimp email address management and message sending service provided by The Rocket Science Group LLC.

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

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

- a Sale in California
- a Sharing in California

# **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

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

#### Facebook Like button and social widgets (Facebook, Inc.)

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

Personal Data processed: Cookies; Usage Data.

Place of processing: US – 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

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

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

Personal Data processed: Cookies; Usage Data.

Place of processing: US – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

# Pinterest "Pin it" button and social widgets (Pinterest)

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

Personal Data processed: Cookies; Usage Data.

Place of processing: US – 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

# Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale 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

# **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 Application, for contacting and being contacted by this Application 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 (Facebook, Inc.)

The Facebook Messenger Customer Chat is a service for interacting with the Facebook Messenger live chat platform provided by Facebook, Inc.

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

# Managing contacts and sending messages

This type of services makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

## Mailchimp (The Rocket Science Group, LLC.)

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

Personal Data processed: email address.

Place of processing: US – Privacy Policy.

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

This processing constitutes:

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

# Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

# Mailchimp Landing Page (The Rocket Science Group LLC)

Mailchimp Landing Page is a landing page management service provided by The Rocket Science Group LLC, that allows this Application to collect the email addresses of Users interested in its service.

Mailchimp Landing Page allows the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of the created landing pages.

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

Place of processing: United States – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

## Platform services and hosting

These services have the purpose of hosting and running key components of this Application, therefore allowing the provision of this Application from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

# WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to build, run and host this Application.

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

Place of processing: United States – <u>Privacy Policy</u>.

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

· a Sale in California

# **Registration and authentication**

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes. 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.

### WordPress.com Single Sign On (Automattic Inc.)

WordPress.com Single Sign On is a registration and authentication service provided by Automattic Inc. and is connected to the WordPress.com network.

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

Place of processing: United States – Privacy Policy.

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

This processing constitutes:

• a Sale in California

# Registration and authentication provided directly by this Application

By registering or authenticating, Users allow this Application 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 Application)

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

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

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

This processing constitutes:

## Remarketing and behavioral targeting

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

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

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

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the <u>Network Advertising Initiative opt-out page</u>.

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

### Google Ad Manager Audience Extension (Google Inc.)

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that tracks the visitors of this Application and allows selected advertising partners to display targeted ads across the web to them.

Personal Data processed: Cookies; Usage Data.

Place of processing: US - Privacy Policy - Opt Out.

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

- a Sale in California
- a Sharing in California

### Facebook Custom Audience (Facebook, Inc.)

Facebook Custom Audience is a Remarketing and Behavioral Targeting service provided by Facebook, Inc. that connects the activity of this Application with the Facebook advertising network.

Personal Data processed: Cookies; email address.

Place of processing: US – Privacy Policy – Opt Out.

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

This processing constitutes:

- a Sale in California
- a Sharing in California

# Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a Remarketing and Behavioral Targeting service provided by Facebook, Inc. that connects the activity of this Application with the Facebook advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: US - 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
- a Sharing in California

### Remarketing with Google Analytics (Google Inc.)

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 Cookies with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – <u>Privacy Policy</u> – <u>Opt Out</u>.

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

This processing constitutes:

- a Sale in California
- a Sharing in California

# Twitter Tailored Audiences (X Corp.)

Twitter Tailored Audiences is a Remarketing and Behavioral Targeting service provided by Twitter, Inc. that connects the activity of this Application with the Twitter advertising network.

Personal Data processed: Cookies; email address.

Place of processing: United States - Privacy Policy.

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

- a Sale in California
- a Sharing in California

#### Google Ads Remarketing (Google LLC)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.

Personal Data processed: Cookies; 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
- a Sharing in California

# **Tag Management**

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

# Google Tag Manager (Google LLC)

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

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

## **Traffic optimization and distribution**

This type of service allows this Application to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser.

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

# 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 Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

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

Place of processing: United States – <u>Privacy Policy</u>.

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

This processing constitutes:

• a Sale in California

# Information on opting out of interest-based advertising

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

# **Cookie Policy**

This Application uses Trackers. To learn more, Users may consult the **Cookie Policy**.

# **Further Information for Users in the European Union**

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

# Legal basis of processing

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

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

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

## Further information about retention time

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

#### Therefore:

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

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

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

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

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

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

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another

- controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

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

## Details about the right to object to processing

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

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

### How to exercise these rights

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

# Transfer of Personal Data outside of the European Union

#### Data transfer abroad based on consent

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

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

## Data transfer abroad based on standard contractual clauses

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

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

### Data transfer to countries that guarantee European standards

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

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

# **Further information for Users in the United States**

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

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

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

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

## **Notice at collection**

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

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

• •

# Internet or other electronic network activity information

• •

### **Identifiers**

. .

# Inferences drawn from other personal information

• •

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

If 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 "<u>Your privacy rights under US state laws</u>" section of our privacy policy.

For more details on the collection of Personal Information, please read the section "<u>Detailed information on the processing of Personal Data</u>" of our privacy policy.

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

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

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

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

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

# Your privacy rights under US state laws

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

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

# Additional rights for Users residing in California

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

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

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

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

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

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

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

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

# Additional information about Data collection and processing

# Legal action

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

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

### Additional information about User's Personal Data

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

# System logs and maintenance

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

# Information not contained in this policy

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

# Changes to this privacy policy

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

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

# **Definitions and legal references**

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

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

### **Sensitive Personal Information**

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

### **Usage Data**

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

#### User

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

# **Data Subject**

The natural person to whom the Personal Data refers.

# **Data Processor (or Processor)**

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

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

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

### **This Application**

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

#### Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

#### Sale

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

# **Sharing**

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

# **Targeted advertising**

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

# **European Union (or EU)**

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

### Cookie

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

# Tracker

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

## **Legal information**

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

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

Latest update: March 07, 2024