Privacy Policy of www.commergo.com

This Application collects some Personal Data from its Users.

Owner and Data Controller

Primis di Paolo De Felice, Viale G.Puccini, 1368 – 55100 Lucca, Italia

Owner contact email: www.commergo.com@gmail.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; phone number; email address; first name; last name; profession; province; state; country; ZIP/Postal code; gender; date of birth; city; address; company name; VAT Number; fax number; various types of Data; Tax ID; field of activity; User ID; number of employees; general activity data; username; website; password; Social Security number (SSN); picture; workplace; marital status; billing address; shipping address; house number; prefix ; data relating to the point of sale; language; profile picture; Twitter handle; Data communicated while using the service; payment info; purchase history; number of Users; device information; session statistics; latitude (of city); longitude (of city); browser information; Data communicated in order to use the Service.

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: Interaction with external social networks and platforms, Content commenting, Contacting the User, Analytics, Displaying content from external platforms, Tag Management, Social features, Handling activity data, Registration and authentication, Content performance and features testing (A/B testing), Remarketing and behavioral targeting, Advertising, Managing contacts and sending messages, Handling payments, RSS feed management, SPAM protection, Platform services and hosting and Traffic optimization and distribution.

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:

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.

Microsoft Advertising (Microsoft Corporation)

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Cookies; Usage Data.

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

Google AdSense (Google LLC)

Google AdSense is an advertising service provided by Google LLC. 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: United States – Privacy Policy – Opt Out.

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 – Privacy Policy.

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.

User ID extension for Google Analytics (Google Inc.)

Google Analytics on this Application makes use of a feature called User ID. This setup allows for a more accurate tracking of Users by associating that User with the same ID over various sessions and devices. It is set up in a way that doesn’t allow Google to personally identify an individual or permanently identify a particular device.

The User ID extension might make it possible to connect Data from Google Analytics with other Data about the User collected by this Application.
The opt-out link below will only opt you out for the device you are on, but not from tracking performed independently by the Owner. Contact the Owner via the email address provided in this privacy policy to object to the aforementioned tracking as well.

Personal Data processed: Cookies.

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

Display Advertising extension for Google Analytics (Google Inc.)

Google Analytics on this Application might use Google's Interest-based advertising, 3rd-party audience data and information from the DoubleClick Cookie to extend analytics with demographics, interests and ads interaction data.

Personal Data processed: Cookies; Usage Data.

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

Google Analytics (Universal Analytics) with anonymized IP (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.
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: Cookies; Usage Data.

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

Google Analytics (Universal Analytics) (Google Inc.)

Google Analytics (Universal Analytics) is a web analysis service provided by Google Inc. ("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: United States – Privacy Policy – Opt Out.

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 Google's official documentation.

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

Personal Data processed: browser information; 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.

Contacting the User

Phone contact (This Application)

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

Personal Data processed: phone number.

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: address; city; company name; Cookies; country; date of birth; email address; first name; gender; last name; phone number; profession; province; state; Usage Data; ZIP/Postal code.

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

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: US – Privacy Policy.

Comment system managed directly (This Application)

This Application has its own internal content comment system.

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

Content performance and features testing (A/B testing)

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

Google Optimize (Google Inc.)

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

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

Personal Data processed: Cookies; Usage Data.

Place of processing: US – Privacy Policy.

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 Fonts (Google Inc.)

Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this 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: US – Privacy Policy.

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 – Privacy Policy.

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: United States – Privacy Policy.

YouTube video widget

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

Personal Data processed: Trackers; Usage Data.

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

YouTube Data API

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

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 security settings page provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

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

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

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

Handling activity data

This type of services allows the Owner to use the activity data collected by your device in order for this Application to operate or to provide specific features. This may include movements, heartbeat, change in altitude or data about the surroundings.
Depending on what is described below, third parties may be involved in the activity tracking.
Most devices allow for the User to control which Data is accessed or stored.

Activity data tracked by your device (This Application)

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

Personal Data processed: general activity data.

Handling payments

Payment processing services enable this Application to process payments by credit card, bank transfer or other means. To ensure greater security, this Application shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction.
Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

PayPal (PayPal Inc.)

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

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

Place of processing: See the PayPal privacy policy – Privacy Policy.

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; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Clearpay

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

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.

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.

PayPal button and widgets (PayPal Inc.)

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

Personal Data processed: Cookies; Usage Data.

Place of processing: See the PayPal privacy policy – Privacy Policy.

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 – Privacy Policy.

AddThis (Oracle Corporation)

AddThis is a service provided by Oracle Corporation, which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of this Application.
Depending on the configuration, this service can display widgets belonging to third parties such as the managers of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

Google Friend Connect (Google LLC)

Google Friend Connect is a social interaction service provided by Google LLC.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.
These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

SendinBlue Email (SendinBlue SAS)

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

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

Place of processing: France – Privacy Policy.

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.

PrestaShop (PrestaShop S.A.)

PrestaShop is a platform provided by PrestaShop S.A. that allows the Owner to build, run and host an e-commerce website.

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

Place of processing: France – Privacy Policy.

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.

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

Log In with PayPal (PayPal Inc.)

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

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

Place of processing: See the PayPal privacy policy – Privacy Policy.

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 Network Advertising Initiative opt-out page.

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

Remarketing with Google Analytics (Google LLC)

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC 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: United States – Privacy Policy – Opt Out.

Google Ad Manager Audience Extension (Google LLC)

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC 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: United States – Privacy Policy – Opt Out.

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.

RSS feed management

This type of service allows this Application to manage RSS feeds and the distribution of their content. Depending on the characteristics of the service used, these services may be used to insert ads within the content and to gather statistics data from them.

FeedPress (Beta Et Compagnie Sarl)

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

Personal Data processed: Usage Data.

Place of processing: France – Privacy Policy.

Social features

Inviting and suggesting friends (This Application)

This Application 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.

SPAM protection

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

Google reCAPTCHA (Google 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: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

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 Inc.)

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

Personal Data processed: Usage Data.

Place of processing: US – Privacy Policy.

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 – Privacy Policy.

Information on opting out of interest-based advertising

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

Further information about the processing of Personal Data

The Service is not directed to children under the age of 13

Users declare themselves to be adult according to their applicable legislation. Minors may use this Application only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use this Application.

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 Application depends on the payment system used.

Pseudonymous use

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

Automated decision-making

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on the User, is taken solely by technological means, without any human intervention. This Application may use the User's Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. This Application adopts automated decision-making processes as far as necessary to enter into or perform a contract between User and Owner, or on the basis of the User’s explicit consent, where such consent is required by the law.
Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may also be provided by third parties.
The rationale behind the automated decision making is:

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

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

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

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

To learn more about the User’s rights and the means to exercise them, the User is invited to consult the section of this document relating to the rights of the User.

Unique device identification

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

User identification via a universally unique identifier (UUID)

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

Personal Data collected through sources other than the User

The Owner of this Application 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.

Analysis and predictions based on the User's Data ("profiling")

The Owner may use the Personal and Usage Data collected through this Application to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.
User profiles can also be created through the use of automated tools like algorithms, which can also be provided by third parties. To find out more about the profiling activities performed, Users can check the relevant sections of this document.
The User always has a right to object to this kind of profiling activity. To find out more about the User's rights and how to exercise them, the User is invited to consult the section of this document outlining the rights of the User.

Access the address book

This Application may request access to your address book.

Preference Cookies

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

Cookie Policy

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

Further Information for Users

Legal basis of processing

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

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

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

Further information about retention time

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

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.

- Personal Data collected for the purposes of the Owner’s legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

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

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

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

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

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

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

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

Details about the right to object to processing

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

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

How to exercise these rights

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

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)

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

Usage Data

Information collected automatically through this 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.

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

Latest update: October 06, 2024