

Privacy Policy of www.xtreme-skate.com

This Website collects some Personal Data from its Users.

Owner and Data Controller

01 Web Agency S.r.l.s.
Via Monte Fumaiolo, 44
00139 Roma (Italia)

Owner contact email: info@xtreme-skate.com

Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: phone number; email address; Usage Data; Trackers; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; first name; last name; date of birth; password; VAT Number; company name; Tax ID; billing address; physical address; various types of Data; payment info; device information; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); language; number of Users; city; session statistics; latitude (of city); longitude (of city); browser information; Data communicated while using the service; user content; contents of the email or message; profile picture; date of the message; time the message was sent; sender of the message; purchase history.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website. Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

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

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

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

Mode and place of processing the Data

Methods of processing

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

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

Place

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

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

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

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: Contacting the User, Handling payments, Spam and bots protection, Registration and authentication, Registration and authentication provided directly by this Website, Remarketing and behavioural targeting, Advertising, Analytics, Displaying content from external platforms, Backup saving and management, Platform services and hosting, Access to third-party accounts, Tag management, Collection of privacy-related preferences, Interaction with live chat platforms, Hosting and backend infrastructure, Managing contacts and sending messages and Managing data collection and online surveys.

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

Facebook permissions asked by this Website

This Website may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows this Website to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the [Facebook permissions documentation](#) and to the [Facebook privacy policy](#).

The permissions asked are the following: Basic information and Email.

Detailed information on the processing of Personal Data

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

Access to third-party accounts

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

Facebook account access (Meta Platforms, Inc.)

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

Permissions asked: Email.

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

Advertising

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

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

Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

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

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

Personal Data processed: Trackers; Usage Data.

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

Google Ads conversion tracking (Google Ireland Limited)

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

Personal Data processed: Trackers; Usage Data.

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

Pinterest Conversion Tag (Pinterest, Inc.)

Pinterest Conversion Tag is an analytics service provided by Pinterest, Inc. that connects data from the Pinterest advertising network with actions performed on this Website.

Users may opt out of behavioural advertising features through their device settings, their Pinterest [personalization settings](#) or by visiting the [AdChoices opt-out page](#).

Personal Data processed: device information; Trackers; Usage Data.

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

Facebook Lookalike Audience (Meta Platforms Ireland Limited)

Facebook Lookalike Audience is an advertising and behavioural targeting service provided by Meta Platforms Ireland Limited that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behaviour to Users who are already in a Custom Audience list on the base of their past use of this Website or engagement with relevant content across the Facebook apps and services.

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

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

Personal Data processed: Trackers; Usage Data.

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

Google Conversion linker (Google Ireland Limited)

Google Conversion linker is an analytics service provided by Google Ireland Limited that connects Data from the Google advertising services with actions performed on this Website. Depending on the setup of the service, such Data might also be used for retargeting purposes.

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

Personal Data processed: Trackers; Usage Data.

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

Analytics

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

Analytics collected directly

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

Personal Data processed: Trackers; Usage Data.

Google Analytics Advertising Reporting Features (Google Ireland Limited)

Google Analytics on this Website 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 analyse specific behaviour 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: Trackers; 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: Ireland – [Privacy Policy](#) – [Opt Out](#).

Google Analytics Demographics and Interests reports (Google Ireland Limited)

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

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

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

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

User ID extension for Google Analytics (Google Ireland Limited)

Google Analytics on this Website 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 Website.

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: Trackers.

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

Google Analytics 4 (Google Ireland Limited)

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

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

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

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

Meta Events Manager (Meta Platforms Ireland Limited)

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

Personal Data processed: Trackers; Usage Data.

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

Google Looker Studio (Google Ireland Limited)

Google Looker Studio is an analytics service provided by Google Ireland Limited that creates reports of data gathered in an aggregated way from different sources.

Personal Data processed: Usage Data.

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

Backup saving and management

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

OVH Storage and backup (OVH Srl)

OVH Storage and backup is a service to save and manage backups provided by OVH Srl.

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

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

Collection of privacy-related preferences

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

iubenda Cookie Solution (iubenda srl)

The iubenda Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information and in particular to the use of Cookies and other Trackers on this Website.

Personal Data processed: Trackers.

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

Contacting the User

Phone contact

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

Personal Data processed: phone number.

Mailing list or newsletter

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

Personal Data processed: email address.

Contact form

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

Personal Data processed: email address.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction.

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

Google Fonts (Google Ireland Limited)

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

Personal Data processed: Trackers; Usage Data.

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

Font Awesome (Fonticons, Inc.)

Font Awesome is a typeface visualisation service provided by Fonticons, Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

YouTube video widget without cookies (Google Ireland Limited)

YouTube is a video content visualisation service provided by Google Ireland Limited that allows this Website to incorporate content of this kind on its pages.

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

Personal Data processed: Usage Data.

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

Handling payments

Unless otherwise specified, this Website processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Website isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

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](#).

PayNow (Klarna AB)

PayNow is a payment service provided by Klarna AB.

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

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

Payment by bank transfer (this Website)

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

Personal Data processed: company name; first name; last name; payment info.

Apple Pay (Apple Inc.)

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

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

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

Klarna (Klarna AB)

Klarna is a payment service provided by Klarna AB.

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

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

Hosting and backend infrastructure

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

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Google BigQuery (Google Ireland Limited)

Google BigQuery is a hosting and backend service provided by Google Ireland Limited.

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

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

Interaction with live chat platforms

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

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

WhatsApp Business Chat widget (Meta Platforms Ireland Limited)

WhatsApp Business Chat widget is a service for interacting with the WhatsApp instant messaging app and platform provided by Meta Platforms Ireland Limited.

Personal Data processed: answers to questions; contents of the email or message; Data communicated while using the service; date of the message; first name; last name; phone number; profile picture; sender of the message; time the message was sent; user content.

Place of processing: Ireland – [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.

Klaviyo (Klaviyo Inc.)

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

To take advantage of the service provided by Klaviyo, the Owner typically shares information about (purchasing) Users, such as for example contact details and shopping histories. Check the indication at "Personal Data processed" below for an explanation of the extent of the sharing.

Personal Data processed: date of birth; email address; first name; last name; phone number; purchase history; Trackers; Usage Data; various types of Data.

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

Managing data collection and online surveys

This type of service allows this Website to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

Klaviyo Forms (Klaviyo Inc.)

Klaviyo Forms is a form builder and data collection platform provided by Klaviyo Inc.

To take advantage of the service provided by Klaviyo, the Owner typically shares information about (purchasing) Users, such as for example contact details and shopping histories. Check the indication at "Personal Data processed" below for an explanation of the extent of the sharing.

Personal Data processed: Data communicated while using the service; date of birth; email address; first name; last name; phone number; Trackers; Usage Data.

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

Platform services and hosting

These services have the purpose of hosting and running key components of this Website, therefore allowing the provision of this Website from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

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: device information; email address; first name; language; last name; phone number; Usage Data; 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 Website to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Website will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Twitter OAuth (X Corp.)

Twitter OAuth is a registration and authentication service provided by Twitter, Inc. and is connected to the Twitter social network.

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

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

Google OAuth (Google Ireland Limited)

Google OAuth is a registration and authentication service provided by Google Ireland Limited and is connected to the Google network.

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

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

Facebook Authentication (Meta Platforms, Inc.)

Facebook Authentication is a registration and authentication service provided by Meta Platforms, Inc. and is connected to the Facebook social network.

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

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

Login with Amazon (Amazon)

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

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

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

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](#).

Registration and authentication provided directly by this Website

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

Direct registration

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

Personal Data processed: billing address; company name; date of birth; email address; first name; last name; password; phone number; physical address; Tax ID; various types of Data; VAT Number.

Remarketing and behavioural targeting

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

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

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

Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioural targeting service provided by Google Ireland Limited that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie.

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

Personal Data processed: Trackers; Usage Data.

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

Facebook Custom Audience (Meta Platforms, Inc.)

Facebook Custom Audience is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. that connects the activity of this Website with the Facebook advertising network.

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

Personal Data processed: email address; Trackers.

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

Facebook Remarketing (Meta Platforms Ireland Limited)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms Ireland Limited that connects the activity of this Website with the Facebook advertising network.

Personal Data processed: Trackers; Usage Data.

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

Remarketing with Google Analytics (Google Ireland Limited)

Remarketing with Google Analytics is a remarketing and behavioural targeting service provided by Google Ireland Limited that connects the tracking activity performed by Google Analytics and its Trackers with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Trackers; Usage Data.

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

Google Signals (Google Ireland Limited)

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

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

Personal Data processed: Trackers; Usage Data.

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

Spam and bots protection

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

Google reCAPTCHA (Google Ireland Limited)

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

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

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

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

Tag management

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

Google Tag Manager (Google Ireland Limited)

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

Personal Data processed: Trackers; Usage Data.

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

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

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Website depends on the payment system used.

Equal protection of User Data

This Website shares User Data only with third parties carefully selected to ensure that they provide the same or equal protection of User Data as stated in this privacy policy and requested by applicable data protection laws. Further information on data processing and privacy practices by third parties can be found in their respective privacy policies.

Cookie Policy

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

Further Information for Users

Legal basis of processing

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

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

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

Further information about retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

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 of Data transfers to a country outside the European Union or to any international organisation 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.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

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.

Further information for Users in Brazil

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

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

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

The grounds on which we process your personal information

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

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

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

Categories of personal information processed

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

Why we process your personal information

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

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

Your Brazilian privacy rights

You have the right to:

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

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

How to file your request

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

How and when we will respond to your request

We will strive to promptly respond to your requests.

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

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

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

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

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

Transfer of personal information outside of Brazil permitted by the law

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

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

Additional information about Data collection and processing

Legal action

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

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

Additional information about User's Personal Data

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

System logs and maintenance

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

Information not contained in this policy

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

Changes to this privacy policy

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

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

Definitions and legal references

Personal Data (or Data)

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

Usage Data

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilised by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

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

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

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

Data Controller (or Owner)

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

This Website (or this Application)

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

Service

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

European Union (or EU)

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

Cookie

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

Tracker

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

Legal information

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

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

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