

Privacy Policy of Schutz

This Website collects some Personal Data from its Users.

Owner and Data Controller

ARZZ International Inc.
595 Madison Avenue, 15th floor, New York, NY, 10022

Owner contact email: dataprotection@arezzousa.com

Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Usage Data; Trackers; email address; first name; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); username; password; payment info; last name; billing address; shipping address; phone number; device information; address; contact details; number of sessions; session duration; operating systems; clicks; interaction events; page views; gender; date of birth; city; state; province; ZIP/Postal code; country; purchase history; browsing history; session statistics; referral URL; product interaction; order ID; User ID.

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

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

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

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

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

Mode and place of processing the Data

Methods of processing

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

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

Place

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

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

Retention time

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

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Displaying content from external platforms, Advertising, Tag Management, Traffic optimization and distribution, Managing contacts and sending messages, Analytics, Heat mapping and session recording, Remarketing and behavioral targeting, Handling payments, Platform services and hosting, Contacting the User, Hosting and backend infrastructure, Communication, Marketing, Registration and authentication, Managing data collection and online surveys, User database management, Commercial affiliation and Access to third-party accounts.

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

Facebook permissions asked by this Website

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

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

The permissions asked are the following:

Basic information

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

device information

Email

Provides access to the User's primary email address.

Trackers

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.

Usage Data

Detailed information on the processing of Personal Data

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

Access to third-party accounts

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

Facebook account access (Meta Platforms, Inc.)

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

Permissions asked: device information; Email; Trackers; Usage Data.

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

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

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Website, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers 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 Website. 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: Trackers; Usage Data.

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

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

This processing constitutes:

- a Sharing in California

TikTok conversion tracking (TikTok Inc.)

TikTok conversion tracking is an analytics and behavioral targeting service provided by TikTok Inc. that connects data from the TikTok advertising network with actions performed on this Website. The TikTok pixel tracks conversions that can be attributed to TikTok ads and enables to target groups of Users on the base of their past use of this Website.

Personal Data processed: Trackers.

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

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

This processing constitutes:

- a Sharing in California

Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. 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: United States – [Privacy Policy](#) – [Opt out](#).

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

This processing constitutes:

- a Sharing in California

Pinterest Ads (Pinterest, Inc.)

Pinterest Ads is an advertising service provided by Pinterest, Inc. that allows the Owner to run advertising campaigns on the Pinterest advertising network.

Users may opt out of behavioral advertising features through their device settings, their Pinterest [personalization settings](#).

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

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

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

This processing constitutes:

- a Sharing in California

Global (Global Media Group Services Limited)

Global is an advertising service provided by Global Media Group Services Limited.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

GlobalWebIndex (Trendstream Limited)

GlobalWebIndex is an advertising service provided by Trendstream Limited.

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California

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 Website.

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

Personal Data processed: Trackers; Usage Data.

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

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

Google Ads enhanced conversions (Google LLC)

Google Ads enhanced conversions is an advertising service provided by Google LLC that allows the Owner to send hashed first-party conversion Data to Google in order to improve conversion measurements.

Personal Data processed: address; contact details; email address; first name; last name; phone number; Trackers.

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

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

Google Ads Similar audiences (Google LLC)

Similar audiences is an advertising and behavioral targeting service provided by Google LLC that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of this Website. On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google [Ad Settings](#).

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

Personal Data processed: Trackers; Usage Data.

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

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

Meta Lookalike Audience (Meta Platforms, Inc.)

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

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

Personal Data processed: Trackers; Usage Data.

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

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

Meta Advanced Matching (Meta Platforms, Inc.)

Meta Advanced Matching is an advertising service provided by Meta Platforms, Inc. that allows the Owner to send hashed first-party conversion Data to Meta in order to improve conversion measurements.

Personal Data processed: city; country; date of birth; email address; first name; gender; last name; phone number; province; state; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data; ZIP/Postal code.

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

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

TikTok Advanced Matching (TikTok Inc.)

TikTok Advanced Matching is an advertising service provided by TikTok Inc. that allows the Owner to send hashed first-party conversion Data to TikTok in order to improve conversion measurements.

Personal Data processed: city; country; email address; first name; last name; order ID; phone number; state; User ID; ZIP/Postal code.

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

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

This processing constitutes:

- a Sale in California
- a Sharing in California
- Targeted Advertising in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

Analytics

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

Google Analytics 4 (Google LLC)

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

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

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

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

Personal Data processed: Trackers.

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

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

This processing constitutes:

- a Sharing in California

Meta Events Manager (Meta Platforms, Inc.)

Meta Events Manager is an analytics service provided by Meta Platforms, Inc. 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: United States – [Privacy Policy](#) – [Opt out](#).

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

This processing constitutes:

- a Sharing in California

Google Analytics Advertising Reporting Features (Google LLC)

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 analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

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

Personal Data processed: 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: United States – [Privacy Policy](#) – [Opt Out](#).

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

This processing constitutes:

- a Sharing in California

Google Analytics for Firebase (for apps) (Google LLC)

Google Analytics for Firebase (for apps) or Firebase Analytics is an analytics service provided by Google LLC. **In order to understand Google's use of Data, consult [Google's partner policy](#).**

Firebase Analytics may share Data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. The User may check this privacy policy to find a detailed explanation about the other tools used by the Owner.

This Website uses identifiers for mobile devices and technologies similar to cookies to run the Firebase Analytics service.

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

Personal Data processed: device information; number of sessions; operating systems; session duration; Trackers; Usage Data.

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

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

User ID extension for Google Analytics (Google LLC)

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

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

Shopify Analytics (Shopify Inc.)

Shopify Analytics is an analytics service provided by Shopify Inc.

Personal Data processed: browsing history; clicks; country; device information; product interaction; purchase history; referral URL; session statistics; Trackers; Usage Data.

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

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

This processing constitutes:

- a Sale in California

Commercial affiliation

This type of service allows this Website to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics. Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with this Website. For details of which data are collected, please refer to the privacy policy of each service.

Awin (AWIN AG)

Awin is a commercial affiliation service provided by AWIN AG.

Personal Data processed: Trackers; Usage Data.

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

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

Communication

Message Content and mobile alerts

You will receive SMS messages containing information about our latest products, promotions, events, and other updates related to our brand. These messages may include sales, marketing content, surveys, or other communications.

Message Frequency: We aim to send SMS messages only when we believe they are relevant and valuable to you. Message frequency may vary depending on promotions, events, and your engagement with our brand.

Unsubscribe/Opting Out: You have the right to opt out of receiving SMS messages from us at any time. To do so, simply reply "STOP" for 44379 to any message you receive from us. You may also contact our customer service team on customercare@schutzusa.com for assistance with opting out.

Data Security: We take the security of your personal information seriously and implement measures to protect it from unauthorized access, disclosure, alteration, or destruction.

Privacy Policy: Please review our Privacy Policy, which is incorporated into these Terms of Use and also governs your use of the Schutz Shoes site <https://schutz-shoes.com/pages/privacy-policy>.

By opting in to receive SMS messages from Schutz, you acknowledge that you have read, understood, and agreed to these SMS

Terms & Use, as well as our Privacy Policy. If you have any questions or concerns about our SMS service or privacy practices, please contact us.

This processing constitutes:

- a Sharing in California

Manifest IA

We use the Manifest AI chat service to provide customer support and improve user interaction on our website. This service may process personal data such as contact details, usage information, device identifiers, and IP address in order to enable communication, ensure service quality, and enhance user experience. For more information, please refer to the Manifest AI Privacy Notice

Contacting the User

Contact form (this Website)

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

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

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

This processing constitutes:

- a Sharing in California

Kustomer

Kustomer is a communication platform provided by Kustomer Inc. that provides a SaaS customer relationship management platform that optimizes communications and interactions by chat, e-mail, and contact form.

Personal Data processed: billing address; device information; email address; first name; last name; phone number; shipping address; Trackers; Usage Data; chat recordings.

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

This processing constitutes:

- a Sharing in California

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

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

Google Fonts (Google LLC)

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

Personal Data processed: Trackers; Usage Data.

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

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

This processing constitutes:

- a Sale in California

Handling payments

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

PayPal (PayPal Inc.)

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

Personal Data processed: email address; first name; password; payment info; username.

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

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

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

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: payment info; Trackers; Usage Data.

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

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

AfterPay.com (Afterpay US, Inc.)

AfterPay.com is a payment service provided by Afterpay US, Inc. that allows customers to pay in installments.

Personal Data processed: Trackers; Usage Data.

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

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

Heat mapping and session recording

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

Microsoft Clarity (Microsoft Corporation)

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation. Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: Trackers.

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

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

This processing constitutes:

- a Sharing in California

Hosting and backend infrastructure

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

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

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

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

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

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

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

This processing constitutes:

- a Sharing in California

AudioEye (AudioEye, Inc.)

AudioEye is a service that helps websites to comply with accessibility standards and is provided by AudioEye, Inc.

Personal Data processed: clicks; interaction events; page views; Trackers; Usage Data.

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

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

Amazon S3 (Amazon Web Services, Inc.)

Amazon S3 is a cloud storage service provided by Amazon Web Services, Inc.

Personal Data processed: Usage Data.

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

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

Microsoft Azure (Microsoft Corporation)

Microsoft Azure is a hosting service provided by Microsoft Corporation.

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

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

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

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.

Emarsys Email Marketing (Emarsys North America, Inc.)

Emarsys Email Marketing is an email address management and message-sending service provided by Emarsys North America, Inc.

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

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

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

This processing constitutes:

- a Sharing in California

Attentive (Attentive Mobile, Inc.)

Attentive is a message-sending service provided by Attentive Mobile, Inc. Attentive uses the Attentive tag as a Tracker to recognize and track User behavior as well as to manage any User-entered data such as email or telephone numbers.

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

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

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

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.

Meta lead ads (Meta Platforms, Inc.)

Meta lead ads is an advertising and data collection service provided by Meta Platforms, Inc. that allows form-based ads to be shown to Users pre-populated with Personal Data from their Facebook profiles, such as names and email addresses. Depending on the type of advertisement, Users may be requested to provide further information.

Form submission results in the collection and processing of these Data by the Owner under this privacy policy, and only for the specific purpose outlined on the form and/or inside this privacy policy, where provided.

Users may exercise their rights, at any time, including the right to withdraw their consent to the processing of their Data, as specified in the section containing information about User rights in this privacy policy.

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

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

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

Marketing

Zinrelo

Zinrelo is a powerhouse for modern businesses looking to take their customer engagement to the next level. By combining AI analytics, multi-dimensional rewards and omnichannel capabilities Zinrelo creates custom loyalty programs that speak to customers. Zinrelo goes beyond transactional loyalty, creating emotional and behavioral connections through experiences that match individual preferences.

Zinrelo do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for our Services. No one under age 13 may provide any personal information to us or on the Services.

Whose information does Zinrelo collect?

We gather various types of Personal Information from our users, as explained more fully below. We may use Personal Information to personalize and improve the Services, to allow our users to set up a user account and profile, to contact users, to fulfill your requests for the Services, to analyze how users utilize the Website, and as otherwise set forth in this Privacy Policy. We collect the following types of information:

Information provided to Zinrelo

Information is provided to Zinrelo by users using our website or our loyalty application and may include name, email address, phone number, company name, postal address, social media handles and other such personal information.

Information collected automatically

Whenever you interact with our Website, we automatically receive and record information on our server logs from your browser including your IP address, “cookie” information, and the page you requested. “Cookies” are identifiers we transfer to your

computer or mobile device that allow us to recognize your browser or mobile device and tell us how and when pages in our Website are visited by you. You may be able to change the preferences on your browser or mobile device to prevent or limit your computer or device's acceptance of cookies, but this may prevent you from taking advantage of some of our Website's features. If you click on a link to a third-party website, such third party may also transmit cookies to you.

When you visit the Website, our servers automatically record information that your browser sends whenever you visit a website ("Log Data"). For example, Log Data may include information such as your computer's IP address, browser type or the webpage you were visiting before you came to our Website, pages of our Website that you visit, the time spent on those pages, the information you search for on our Website, access times and dates, and other statistics. We use this information to monitor and analyze use of the Website and the Services and for the Website's technical administration, to increase our Website's functionality and user-friendliness, and to better tailor it to our visitors' needs.

Additionally, we may also track and collect usage information on the website such as the number of visits, page URLs and other visitor tracking information. We may also use technologies such as cookies, beacons, scripts and tags. These technologies are used in analyzing trends, administering the website, tracking users' movements around the site, and gathering demographic information.

Where We Store Your Personal Information?

We store your personal information in the United States. If you are located outside the United States, the information that we collect from you may be transferred to, and stored and processed at, a destination in the United States. By submitting information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.

Will Zinrelo Share Any Of The Personal Information It Receives?

We neither rent nor sell your Personal Information in personally identifiable form to anyone. We share such Personal Information in personally identifiable form with third parties as described below.

Trusted third parties

We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide the Services to you. Unless we tell you differently, such third parties do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

Business transfers

We may choose to buy or sell assets. In these types of transactions, customer information is typically one of the business assets that is transferred. Also, if we (or substantially all of our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information would be one of the assets transferred to or acquired by a third party. You will be notified via email and/or a prominent notice on our Website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Protection of zinrelo and others

We may choose to buy or sell assets. In these types of transactions, customer information is typically one of the business assets that is transferred. Also, if we (or substantially all of our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information would be one of the assets transferred to or acquired by a third party. You will be notified via email and/or a prominent notice on our Website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

With your consent

Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and you will be able to prevent the sharing of this information.

Is The Personal Information Secure?

We take maximum care to protect the privacy of your account and other Personal Information we hold in our records. the protection of user data is a high priority for us.

Zinrelo is SOC 2 Type 1 Compliant. System and Organization Controls (SOC) is developed by the American Institute of CPAs (AICPA). SOC 2 defines criteria for managing customer data based on five "trust service principles"—security, availability, processing integrity, confidentiality, and privacy. SOC Compliance indicates that Zinrelo follows the highest standards for protecting customer data.

Zinrelo also employs a detailed Information Security Policy to ensure best practices for the protection of data. While we do not have official ISO certification, our Information Security Policy is modeled on the guidelines of ISO 27001 and ISO 27002 requirements. A copy of our Information Security Policy document is available upon request.

Your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

When you enter your information on our site, we encrypt the transmission of that information using transport layer security

(TLS). However, we cannot guarantee complete security. The transmission of information via the Internet is not completely secure. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

Changes To Zinrelo Privacy Policy. Zinrelo will notify you by posting an announcement on the Website or sending you an email prior to the change becoming effective. You are bound by any changes to the Privacy Policy when you use the Website after such changes have been first posted.

Zinrelo contact

Email: compliance@Zinrelo.com

Postal Mail: Zinrelo, Inc., 122 E Houston Street, Suite 105 San Antonio TX, 78205

This processing constitutes:

- a Sharing in California

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.

Shopify (Shopify Inc.)

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

Personal Data processed: billing address; device information; email address; first name; last name; payment info; phone number; shipping address; Trackers; Usage Data.

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

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

This processing constitutes:

- a Sharing in California

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.

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](#).

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

Facebook Oauth (Meta Platforms, Inc.)

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

Personal Data processed: Trackers; Usage Data.

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

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

Google OAuth (Google LLC)

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

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

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

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

Sign in with Apple (Apple Inc.)

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

Personal Data processed: email address; password.

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

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

Remarketing and behavioral targeting

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

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

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

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

TikTok Remarketing (TikTok Information Technologies UK Limited)

TikTok Remarketing is a remarketing and behavioral targeting service provided by TikTok Information Technologies UK Limited that connects the activity of this Website with the TikTok advertising network.

Personal Data processed: Trackers.

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

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

This processing constitutes:

- a Sharing in California

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 Website with the Google Ads advertising network and the DoubleClick Cookie.

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

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

Personal Data processed: Trackers; Usage Data.

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

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

Facebook Remarketing (Meta Platforms, Inc.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of this Website with the Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

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

Meta Custom Audience (Meta Platforms, Inc.)

Meta Custom Audience is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of this Website with the Meta Audience Network.

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

Personal Data processed: email address; Trackers.

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

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

Tag Management

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

Google Tag Manager (Google LLC)

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

Personal Data processed: Trackers.

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

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

This processing constitutes:

- a Sharing in California

Traffic optimization and distribution

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

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

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

Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through this Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

Personal Data processed: Trackers.

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

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

This processing constitutes:

- a Sharing in California

User database management

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

Emarsys CRM (SAP Emarsys eMarketing Systems GmbH)

Emarsys CRM is a customer relationship management (CRM) platform provided by SAP Emarsys eMarketing Systems GmbH. CRM platforms provide a central place to track customer information and history throughout the sales process.

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

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

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

Emarsys Marketing Automation (SAP Emarsys eMarketing Systems GmbH)

Emarsys Marketing Automation is a User database management service provided by SAP Emarsys eMarketing Systems GmbH that manages marketing processes.

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

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

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

Information on opting out of interest-based advertising

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

Cookie Policy

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

Further Information for Users

Legal basis of processing

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

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

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

Further information about retention time

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

Therefore:

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

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

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

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

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

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

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

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

Details about the right to object to processing

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

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

How to exercise these rights

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

Further information for Users in the United States

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

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

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

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

Notice at collection

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

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

Internet or other electronic network activity information

Personal Information collected or disclosed: Usage Data, Trackers, email address, first name, 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, last name, billing address, shipping address, phone number, device information, address, contact details, number of sessions, session duration, operating systems, clicks, interaction events, page views, gender, date of birth, city, state, province, ZIP/Postal code, country, Email, purchase history, browsing history, session statistics, referral URL, product interaction

Sensitive Personal Information collected or disclosed ⓘ: payment info

Purposes:

- Displaying content from external platforms
- Advertising
- Tag Management
- Traffic optimization and distribution
- Managing contacts and sending messages
- Analytics
- Heat mapping and session recording
- Remarketing and behavioral targeting
- Platform services and hosting
- Registration and authentication
- Managing data collection and online surveys
- User database management
- Hosting and backend infrastructure
- Commercial affiliation
- Access to third-party accounts
- Handling payments

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC, Microsoft Corporation, TikTok Inc., Cloudflare Inc., Emarsys North America, Inc., Meta Platforms, Inc., TikTok Information Technologies UK Limited, Pinterest, Inc., Shopify Inc., Global Media Group Services Limited, Trendstream Limited, Attentive Mobile, Inc., SAP Emarsys eMarketing Systems GmbH, AudioEye, Inc., AWIN AG, Amazon Web Services, Inc., Apple Inc., Afterpay US, Inc.

Identifiers

Personal Information collected or disclosed: email address, first name, 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, Usage Data, last name, billing address, shipping address, phone number, device information, address, contact details, gender, date of birth, city, state, province, ZIP/Postal code, country, Email, clicks, purchase history, browsing history, session statistics, referral URL, product interaction, order ID, User ID

Sensitive Personal Information collected or disclosed ⓘ: username, password, payment info

Purposes:

- Managing contacts and sending messages
- Analytics
- Handling payments
- Advertising
- Platform services and hosting
- Contacting the User
- Hosting and backend infrastructure
- Registration and authentication
- Managing data collection and online surveys
- User database management
- Remarketing and behavioral targeting
- Access to third-party accounts

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Emarsys North America, Inc., Google LLC, PayPal Inc., Pinterest, Inc., Shopify Inc., Amazon Web Services, Inc., Attentive Mobile, Inc., Meta Platforms, Inc., SAP Emarsys eMarketing Systems GmbH, Microsoft Corporation, TikTok Inc., Apple Inc.

Service providers or contractors: this Website

Commercial information

Personal Information collected or disclosed: first name, email address, Trackers, last name, billing address, shipping address, phone number, device information, Usage Data, clicks, purchase history, browsing history, session statistics, referral URL, country, product interaction

Sensitive Personal Information collected or disclosed ⓘ: username, password, payment info

Purposes:

- Handling payments
- Platform services and hosting
- Analytics

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: PayPal Inc., Shopify Inc., Apple Inc.

Inferences drawn from other personal information

Personal Information collected or disclosed: email address, language, Trackers, IP address, current page

Purposes:

- Collection of privacy-related preferences

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

This category of Personal Information was collected in the preceding 12 months but is collected no longer

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

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

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

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

What are the sources of the Personal Information we collect?

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

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

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

Your privacy rights under US state laws

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

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

Additional rights for Users residing in California

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

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

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

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

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

In Minnesota and Maryland Users also have the right to obtain a list of the specific third parties to which the controller has disclosed the consumer's personal data

* Note that in some states like Minnesota you have the following specific rights connected to profiling:

- The right to question the results of the profiling;
- The right to be informed of the reason that the profiling resulted in the decision; if feasible

- The right to be informed of what actions the consumer might have taken to secure a different decision and the actions that the consumer might take to secure a different decision in the future;
- The right to review personal data used in the profiling;
- If inaccurate, the right to have the data corrected and the profiling decision reevaluated based on the corrected data;

Additional rights for users residing in Utah and Iowa

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

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

How to exercise your privacy rights under US state laws

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

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

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

How to exercise your rights to opt out

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

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

How and when we are expected to handle your request

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

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

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

Additional information about Data collection and processing

Legal action

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

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

Additional information about User's Personal Data

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

System logs and maintenance

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

Information not contained in this policy

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

Changes to this privacy policy

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

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

Definitions and legal references

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

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

Sensitive Personal Information

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

Usage Data

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

User

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

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

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

Data Controller (or Owner)

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

This Website (or this Application)

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

Service

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

Sale

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

Sharing

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

Targeted advertising

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

European Union (or EU)

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

Cookie

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

Tracker

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

Legal information

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

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

Latest update: September 30, 2025