

# Privacy Policy of PunchLab

PunchLab collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

## Owner and Data Controller

PunchLab SRL  
Via Marsala 29 H/I - 00185 - Roma

**Owner contact email:** [info@punchlab.net](mailto:info@punchlab.net)

## Types of Data collected

Among the types of Personal Data that PunchLab collects, by itself or through third parties, there are: first name; last name; email address; payment info; shipping address; User ID; general activity data; purchase history; username; password; profile picture; social media accounts; Usage Data; Social media accounts permission; billing address; Trackers; device information; Application opens; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); country.

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 PunchLab. Unless specified otherwise, all Data requested by PunchLab is mandatory and failure to provide this Data may make it impossible for PunchLab to provide its services. In cases where PunchLab 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 PunchLab or by the owners of third-party services used by PunchLab serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document.

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

## 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 PunchLab (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: Handling payments, Registration and authentication, Handling activity data, Hosting and backend infrastructure, Managing contacts and sending messages, Content performance and features testing (A/B testing), Platform services and hosting, Tag Management, Device permissions for Personal Data access and Analytics.

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”.

## **Device permissions for Personal Data access**

Depending on the User's specific device, PunchLab may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document. The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of PunchLab.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by PunchLab.

### **Social media accounts permission**

Used for accessing the User's social media account profiles, such as Facebook and Twitter.

## **Detailed information on the processing of Personal Data**

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

### **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.

#### **MixPanel (MixPanel, Inc.)**

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data processed: Trackers; Usage Data.

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

#### **Google Analytics (Universal Analytics) (Google LLC)**

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

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

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

Personal Data processed: Trackers; Usage Data.

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

### **Content performance and features testing (A/B testing)**

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

#### **Firebase Remote Config (Google LLC)**

Firebase Remote Config is an A/B testing and configuration service provided by Google LLC.

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

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

## **Device permissions for Personal Data access**

PunchLab requests certain permissions from Users that allow it to access the User's device Data as described below.

### **Device permissions for Personal Data access (PunchLab)**

PunchLab requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Social media accounts permission.

## **Handling activity data**

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

### **Apple HealthKit (Apple Inc.)**

HealthKit is an activity data handling service provided by Apple Inc. that enables the Owner to access or store activity data.

Personal Data processed: general activity data.

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

## **Handling payments**

Unless otherwise specified, PunchLab 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. PunchLab 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.

### **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: email address; first name; last name; payment info; shipping address.

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

### **Payments processed via the Apple App Store (Apple Inc.)**

PunchLab uses a payment service provided by Apple Inc. that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Apple, as described in the [privacy policy for the App Store](#).

Personal Data processed: purchase history.

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

### **Google Pay (Google LLC)**

Google Pay is a payment service provided by Google LLC, which allows users to make online payments using their Google credentials.

Personal Data processed: email address; first name; last name; payment info; shipping address; Usage Data.

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

### **Stripe (Stripe, Inc.)**

Stripe is a payment service provided by Stripe, Inc.

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

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

### **RevenueCat (RevenueCat, Inc.)**

RevenueCat is a payment service provided by RevenueCat, Inc. The service allows the Owner to monitor and analyze the User and their purchase history and can be used to keep track of User behavior.

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

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

### **Payments processed via the Google Play Store (Google Ireland Limited)**

PunchLab uses a payment service provided by Google Ireland Limited that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Google, as described in the [privacy policy for the Google Play store](#).

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

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

### **Hosting and backend infrastructure**

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

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.

#### **Firebase Cloud Firestore (Google LLC)**

Firebase Cloud Firestore is a hosting and backend service provided by Google LLC.

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

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

#### **Firebase Cloud Functions (Google LLC)**

Firebase Cloud Functions is a hosting and backend service provided by Google LLC.

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

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

#### **Firebase Cloud Storage (Google LLC)**

Firebase Cloud Storage is a hosting service provided by Google LLC.

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

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

#### **Google App Engine (Google LLC)**

Google App Engine is a hosting service provided by Google LLC.

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

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

## **Managing contacts and sending messages**

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

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

### **Firebase Cloud Messaging (Google LLC)**

Firebase Cloud Messaging is a message sending service provided by Google LLC. Firebase Cloud Messaging allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments.

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

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

### **Customer.io (Peaberry Software Inc.)**

Customer.io is an email address management and message sending service provided by Peaberry Software Inc.

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

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

### **Mailgun (Mailgun Technologies, Inc.)**

Mailgun is an email address management and message sending service provided by Mailgun Technologies, Inc.

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

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

## **Platform services and hosting**

These services have the purpose of hosting and running key components of PunchLab, therefore allowing the provision of PunchLab 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.

### **Google Play Store (Google Ireland Limited)**

PunchLab is distributed on the Google Play Store, a platform for the distribution of mobile apps, provided by Google Ireland Limited.

By virtue of being distributed via this app store, Google collects usage and diagnostics data and share aggregate information with the Owner. Much of this information is processed on an opt-in basis.

Users may opt-out of this analytics feature directly through their device settings. More information on how to manage analysis settings can be found on [this page](#).

Personal Data processed: Usage Data.

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

## **Registration and authentication**

By registering or authenticating, Users allow PunchLab 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, PunchLab 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.

### **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; first name; last name; User ID.

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

### **Firebase Authentication (Google LLC)**

Firebase Authentication is a registration and authentication service provided by Google LLC. To simplify the registration and authentication process, Firebase Authentication can make use of third-party identity providers and save the information on its platform.

Personal Data processed: email address; first name; last name; password; profile picture; social media accounts; username.

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

### **Tag Management**

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

### **Google Tag Manager (Google LLC)**

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

Personal Data processed: Usage Data.

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

## **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 follow the instructions provided by [YourOnlineChoices](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

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

## **Further information about the processing of Personal Data**

### **Push notifications**

PunchLab may send push notifications to the User to achieve the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for PunchLab, some or all of the apps on the particular device. Users must be aware that disabling push notifications may negatively affect the utility of PunchLab.

## **Further Information for Users**

### **Legal basis of processing**

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

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

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

## Further information about retention time

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

Therefore:

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

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

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

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

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

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

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

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

## Details about the right to object to processing

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

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

**Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

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

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of PunchLab 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, PunchLab 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, PunchLab and any third-party services may collect files that record interaction with PunchLab (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 PunchLab 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 PunchLab (or third-party services employed in PunchLab), which can include: the IP addresses or domain names of the computers utilized by the Users who use PunchLab, 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 PunchLab 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 PunchLab. The Data Controller, unless otherwise specified, is the Owner of PunchLab.

**PunchLab (or this Application)**

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

**Service**

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

**European Union (or EU)**

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

**Cookie**

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

**Tracker**

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

**Legal information**

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

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