

Privacy Policy of Pirate Skills

Pirate Skills collects some Personal Data from its Users.

Owner and Data Controller

Pirate Skills GmbH
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Germany

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Owner contact email: privacy@pirateskills.com

Types of Data collected

Among the types of Personal Data that Pirate Skills collects, by itself or through third parties, there are: Cookies; Usage Data; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); email address; device information; first name; last name; gender; date of birth; phone number; address; username; profession; company name; country; city; geographic position; Data communicated while using the service; Universally unique identifier (UUID).

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 Pirate Skills. Unless specified otherwise, all Data requested by Pirate Skills is mandatory and failure to provide this Data may make it impossible for Pirate Skills to provide its services. In cases where Pirate Skills 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 Pirate Skills or by the owners of third-party services used by Pirate Skills 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 Pirate Skills.

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 Pirate Skills (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: Analytics, Remarketing and behavioral targeting, Advertising, Displaying content from external platforms, User database management, Interaction with data collection platforms and other third parties, Traffic optimization and distribution, Tag Management, Handling payments, Content performance and features testing (A/B testing), Interaction with online survey platforms, Connecting Data, Registration and authentication, Handling activities related to productivity and Platform services and hosting.

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

Detailed information on the processing of Personal Data

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

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Pirate Skills, 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 for identifying Users, behavioral retargeting i.e. displaying ads tailored to the User’s interests and behavior, or to measure ads performance. 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.

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

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Meta Audience Network with actions performed on Pirate Skills. 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: US – [Privacy Policy](#).

LinkedIn conversion tracking (LinkedIn Insight Tag) (LinkedIn Corporation)

LinkedIn conversion tracking (LinkedIn Insight Tag) is an analytics and behavioral targeting service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on Pirate Skills. The LinkedIn Insight Tag tracks conversions that can be attributed to LinkedIn ads and enables to target groups of Users on the base of their past use of Pirate Skills.

Users may opt out of behavioral targeting features through their device settings, [their LinkedIn account settings](#) or by visiting the [AdChoices opt-out page](#).

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

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

X Ads conversion tracking (X Corp.)

X Ads conversion tracking is an analytics service provided by X Corp. that connects data from the X advertising network with actions performed on Pirate Skills.

Personal Data processed: Trackers; Usage Data.

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

Google Ads conversion tracking (Google Inc.)

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on Pirate Skills.

Personal Data processed: Trackers; Usage Data.

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

Facebook Lookalike Audience (Facebook, Inc.)

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

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

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

Personal Data processed: Cookies; Usage Data.

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

Outbrain (Outbrain Inc.)

Outbrain is an advertising service provided by Outbrain Inc.

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

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

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 Pirate Skills. 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 Pirate Skills.

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

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

Google Ads Similar audiences (Google Ireland Limited)

Similar audiences is an advertising and behavioral targeting service provided by Google Ireland Limited 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 Pirate Skills.

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 [Google's partner policy](#).

Personal Data processed: Trackers; Usage Data.

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

LinkedIn Ads (LinkedIn Ireland Unlimited Company)

LinkedIn Ads is an advertising service provided by LinkedIn Ireland Unlimited Company.

Personal Data processed: Trackers; Usage Data.

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

6sense (6Sense Insights, Inc.)

6sense is an advertising service provided by 6Sense Insights, Inc.

Personal Data processed: Trackers; Usage Data.

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

Analytics

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

Google Analytics with anonymized IP (Google Inc.)

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

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

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Cookies; Usage Data.

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

Google Analytics Advertising Reporting Features (Google Inc.)

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

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

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

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

Matomo (Pirate Skills)

Matomo is an analytics software used by Pirate Skills to analyze data directly without the help of third parties.

Personal Data processed: Tracker; Usage Data.

Clearbit

Clearbit helps identify the companies (not individuals) who visit our website by mapping of a wide range of company domains to IP addresses. Their algorithm continues working to identify and validate matches, based on Clearbit's processing and application of machine learning along with multiple signals from traffic patterns, geolocation, etc.

Meta Events Manager (Meta Platforms Ireland Limited)

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

Personal Data processed: Trackers; Usage Data.

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

Amplitude Analytics (Amplitude Inc.)

Amplitude Analytics is an analytics service provided by Amplitude Inc.

Personal Data processed: email address.

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

Connecting Data

This type of service allows the Owner to connect Data with third-party services disclosed within this privacy policy. This results in Data flowing through these services, potentially causing the retention of this Data.

Zapier (Zapier, Inc.)

Zapier is a workflow automation service provided by Zapier, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: city; company name; country; Data communicated while using the service; email address; first name; gender; geographic position; last name; username.

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

Make (Celonis, Inc.)

Make is a workflow automation service provided by Celonis, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: email address.

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

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 Pirate Skills.

Google Optimize (Google Ireland Limited)

Google Optimize is an A/B testing service provided by Google Ireland Limited ("Google").

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

Personal Data processed: Cookies; Usage Data.

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

VWO - Testing (Wingify Software Pvt. Ltd.)

VWO - Testing is a content performance and features performance testing service provided by Wingify Software Pvt. Ltd.

Personal Data processed: device information; Trackers; Universally unique identifier (UUID); Usage Data.

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

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of Pirate Skills 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.

Gravatar (Automattic Inc.)

Gravatar is an image visualization service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows Pirate Skills to incorporate content of this kind on its pages.

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

Personal Data processed: email address; Usage Data.

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

Google Fonts (Google LLC)

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

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

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

YouTube video widget (Google Ireland Limited)

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

Personal Data processed: Cookies; Usage Data.

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

Handling activities related to productivity

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

Google Docs (Google Ireland Limited)

Google Docs is an online text-editing and collaboration service provided by Google Ireland Limited.

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

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

Handling payments

Unless otherwise specified, Pirate Skills 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. Pirate Skills 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.

Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

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

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

Interaction with data collection platforms and other third parties

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

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

ActiveCampaign widget (ActiveCampaign, Inc.)

The ActiveCampaign widget is a service for interacting with the ActiveCampaign email address management and message sending service provided by ActiveCampaign, Inc.

Personal Data processed: address; company name; date of birth; email address; first name; gender; last name; phone number; profession; Usage Data; username.

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

Interaction with online survey platforms

This type of service allows Users to interact with third-party online survey platforms directly from the pages of Pirate Skills. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Outgrow.co

Outgrow is a service that helps us to create interactive content like quizzes and calculators. It also acts as a lead generator and can ask for personal information like name, email, etc.

Platform services and hosting

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

Webflow (Webflow, Inc.)

Webflow is a platform provided by Webflow, Inc. that allows the Owner to build, run and host Pirate Skills. Webflow is highly customizable and can host websites from simple blogs to complex e-commerce platforms.

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](#) – [Opt out](#).

Registration and authentication

By registering or authenticating, Users allow Pirate Skills 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, Pirate Skills 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.

Google OAuth (Google Ireland Limited)

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

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

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

Linkedin OAuth (LinkedIn Corporation)

Linkedin OAuth is a registration and authentication service provided by LinkedIn Corporation and is connected to the LinkedIn social 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](#).

Remarketing and behavioral targeting

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

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

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

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the [Network Advertising Initiative opt-out page](#).

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

Remarketing with Google Analytics (Google Inc.)

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the tracking activity performed by

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

Personal Data processed: Cookies; Usage Data.

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

Facebook Custom Audience (Facebook, Inc.)

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Pirate Skills with the Facebook advertising network.

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

Personal Data processed: Cookies; email address.

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

Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Pirate Skills with the Facebook advertising network.

Personal Data processed: Cookies; Usage Data.

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

LinkedIn Website Retargeting (LinkedIn Corporation)

LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of Pirate Skills with the LinkedIn advertising network.

Personal Data processed: Cookies; Usage Data.

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

Twitter Remarketing (X Corp.)

Twitter Remarketing is a remarketing and behavioral targeting service provided by Twitter, Inc. that connects the activity of Pirate Skills with the Twitter advertising network.

Personal Data processed: Cookies; Usage Data.

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

Twitter Tailored Audiences (X Corp.)

Twitter Tailored Audiences is a remarketing and behavioral targeting service provided by X Corp. that connects the activity of Pirate Skills with the Twitter advertising network.

Users can opt out from interest-based ads by going to: [Personalization and Data](#).

Personal Data processed: Cookies; email address.

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

Google Ads Remarketing (Google Inc.)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Pirate Skills with the Google Ads advertising network and the DoubleClick Cookie.

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

Personal Data processed: Cookies; Usage Data.

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

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 Pirate Skills with the TikTok advertising network.

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

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

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on Pirate Skills 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 Ireland Limited)

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

Personal Data processed: Usage Data.

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

Traffic optimization and distribution

This type of service allows Pirate Skills 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 Pirate Skills 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 Pirate Skills, i.e., communication between Pirate Skills and the User's browser, while also allowing analytical data from Pirate Skills to be collected.

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

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

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 Pirate Skills, 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 Pirate Skills.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Pirate Skills.

ActiveCampaign (ActiveCampaign, Inc.)

ActiveCampaign is a User database management service provided by ActiveCampaign, Inc.

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

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

Information on opting out of interest-based advertising

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

Further information about the processing of Personal Data

Eventbrite

Eventbrite is an event ticketing solution provided by Eventbrite Inc. Eventbrite can also be used as a medium for communications, either through email, or through messages within their apps.

Personal Data collected: name, email address, billing and shipping address and various types of Data as specified in the privacy policy of the service.

Place of processing: US – Privacy Policy: https://www.eventbrite.com/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_US

Selling goods and services online

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

Cookie Policy

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

Further Information for Users

Legal basis of processing

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

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

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

Further information about retention time

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

Therefore:

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

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

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

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

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

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

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.

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

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

Details about the right to object to processing

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

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

How to exercise these rights

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

Additional information about Data collection and processing

Legal action

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

Pirate Skills (or this Application)

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

Service

The service provided by Pirate Skills 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 Pirate Skills, if not stated otherwise within this document.

Latest update: March 07, 2024