

# Privacy Policy of NOWR

NOWR 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

Officina S.r.l. - Via Venezuela, 15/a - 35127 Padova (Italy)

**Owner contact email:** amministrazione@officina.cc

## Types of Data collected

Among the types of Personal Data that NOWR collects, by itself or through third parties, there are: Trackers; Usage Data; Universally unique identifier (UUID); crash data; device information; email address; number of Users; city; session statistics; latitude (of city); longitude (of city); browser information; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

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 NOWR.

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

## 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 NOWR (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: Registration and authentication, Analytics, Infrastructure monitoring, Displaying content from external platforms, Contacting the User, Interaction with external social networks and platforms, Remarketing and behavioral targeting, Advertising, Access to third-party accounts, Tag Management and Managing contacts and sending messages.

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 NOWR**

NOWR 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 NOWR 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.

### **Access private data**

Access the User's and friends' private 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 NOWR 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 NOWR to connect with the User's account on the Facebook social network, provided by Facebook, Inc.

Permissions asked: Access private data.

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

### **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 NOWR, 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) (Meta Platforms Ireland Limited)**

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

Personal Data processed: Trackers; Usage Data.

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

### **Meta Audience Network (Meta Platforms Ireland Limited)**

Meta Audience Network is an advertising service provided by Meta Platforms Ireland Limited **In order to understand Facebook's use of Data, consult [Facebook's data policy](#).**

NOWR may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Meta Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the [Facebook ad settings](#).

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

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

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

### **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 (Universal Analytics) (Google Inc.)**

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of NOWR, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

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

Personal Data processed: Cookies; Usage Data.

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

#### **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of NOWR, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google's official documentation](#).

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

Personal Data processed: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data.

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

#### **Google Analytics (Universal Analytics) with anonymized IP (Google Ireland Limited)**

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

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

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

Personal Data processed: Trackers; Usage Data.

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

## **Meta Events Manager (Meta Platforms Ireland Limited)**

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

Personal Data processed: Trackers; Usage Data.

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

## **Contacting the User**

### **Mailing list or newsletter (NOWR)**

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

Personal Data processed: email address.

## **Displaying content from external platforms**

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

### **Mapbox widget (Mapbox Inc.)**

Mapbox is a maps visualization service provided by Mapbox Inc. that allows NOWR to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

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

## **Infrastructure monitoring**

This type of service allows NOWR to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of NOWR.

### **Crashlytics (Google Inc.)**

Crashlytics is a monitoring service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: crash data; device information; Universally unique identifier (UUID).

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

## **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of NOWR. The interaction and information obtained through NOWR are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on NOWR isn't being connected back to the User's profile.

### **LinkedIn button and social widgets (LinkedIn Corporation)**

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Cookies; Usage Data.

Place of processing: 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.

## **Invio comunicazioni via mail da parte degli organizzatori degli eventi a cui partecipa l'utente**

Nel momento in cui Lei effettua un acquisto, i Suoi dati vengono trattati anche dall'organizzatore ai fini dell'esecuzione del contratto, configurandosi così una situazione di titolarità indipendente dei dati del cliente.

L'organizzatore può inviare comunicazioni relative agli eventi per i quali è stato acquistato un biglietto d'ingresso o per la promozione di futuri eventi da lui organizzati.

In qualsiasi momento sarà possibile cancellare la propria iscrizione al servizio sopra descritto.

## **Registration and authentication**

By registering or authenticating, Users allow NOWR 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, NOWR 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 (Facebook, Inc.)**

Facebook Authentication is a registration and authentication service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, 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: US – [Privacy Policy](#).

### **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.

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

### **Google OAuth (Google Ireland Limited)**

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

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

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

## **Remarketing and behavioral targeting**

This type of service allows NOWR and its partners to inform, optimize and serve advertising based on past use of NOWR 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.

### **Facebook Remarketing (Meta Platforms Ireland Limited)**

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

Personal Data processed: Trackers; Usage Data.

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

### **Remarketing with Google Analytics (Google Ireland Limited)**

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

Personal Data processed: Trackers; Usage Data.

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

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on NOWR 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: Trackers; Usage Data.

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

## **Information on opting out of interest-based advertising**

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

## **Cookie Policy**

NOWR 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 NOWR 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, NOWR 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, NOWR and any third-party services may collect files that record interaction with NOWR (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 NOWR 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 NOWR (or third-party services employed in NOWR), which can include: the IP addresses or domain names of the computers utilized by the Users who use NOWR, 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 NOWR 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 NOWR. The Data Controller, unless otherwise specified, is the Owner of NOWR.

### **NOWR (or this Application)**

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

**Service**

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

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