

# Privacy Policy of metup.it

This Application collects some Personal Data from its Users.

## Owner and Data Controller

METUP srl  
Via Cavour, 310, 00184, Roma

**Owner contact email:** [affiliations@metup.it](mailto:affiliations@metup.it)

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Usage Data; Trackers; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Data communicated while using the service; password; username; number of Users; session statistics; first name; last name; date of birth; phone number; VAT Number; company name; physical address; fax number; country; state; email address; ZIP/Postal code; various types of Data; city; Tax ID; field of activity; number of employees; website; address; contact details; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); page views; interests; gender; device information; search history; session duration; interaction events; IP address; browser fingerprint; browser information.

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

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

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

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

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

## Mode and place of processing the Data

### Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (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: Traffic optimization and distribution, Displaying content from external platforms, Spam and bots protection, Tag management, Building and running this Application, Analytics, Contacting the User, Remarketing and behavioral targeting, Advertising, Managing support and contact requests, Heat mapping and session recording, Backup saving and management and User database management.

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 this Application, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User’s interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

#### Google Ads conversion tracking (Google LLC)

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

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

Personal Data processed: Trackers; Usage Data.

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

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

#### Google Ads Similar audiences (Google LLC)

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

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

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

Personal Data processed: Trackers; Usage Data.

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

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

#### Google Ads enhanced conversions (Google LLC)

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

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

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

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

### **Google AdSense (Google LLC)**

Google AdSense is an advertising service provided by Google LLC. This service uses the “DoubleClick” Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered. Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

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

Personal Data processed: Trackers; Usage Data.

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

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

### **Google Ads Customer Match (Google LLC)**

Google Ads Customer Match is an advertising service provided by Google LLC that allows matching Data that Users have shared with the Owner to existing Google accounts in order to target them or similar Users with personalized ads. Users can opt out of Google's use of personalized advertising by visiting Google's [Ads Settings](#).

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

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

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

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

### **Google Ad Manager (Google LLC)**

Google Ad Manager is an advertising service provided by Google LLC that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with. This service uses the “DoubleClick” Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

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

Personal Data processed: Trackers; Usage Data.

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

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

### **Google Ads Audience Expansion (Google LLC)**

Google Ads Audience Expansion is an advertising service provided by Google LLC that allows the Owner to expand the available target audience by finding Users who have interests, demographics or online behaviour similar to an existing audience selected by the Owner. Users can opt out of Google's use of personalized advertising by visiting Google's [Ads Settings](#).

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

Personal Data processed: gender; interests; page views; Usage Data.

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

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

### **Google Ads Optimized Targeting (Google LLC)**

Google Ads Optimized Targeting is an advertising service provided by Google LLC that allows the Owner to optimize the available target audience by finding new Users who have interests, demographics or online behaviour similar to Users who have

recently engaged with the Owner's content and ads.

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

Personal Data processed: gender; interests; page views; Usage Data.

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

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

### **Google Ads Smart Bidding (Google LLC)**

Google Ads Smart Bidding is an advertising service provided by Google LLC that maximizes conversions by using various bidding strategies. These strategies may include optimizing bids based on Customer Match lists as well as the User's device information and behavioral activity. Users can opt out of Google's use of personalized advertising by visiting Google's [Ads Settings](#).

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

Personal Data processed: device information; page views; search history.

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

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

### **LinkedIn Ads (LinkedIn Corporation)**

LinkedIn Ads is an advertising service provided by LinkedIn Corporation.

Personal Data processed: Trackers; Usage Data.

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

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

### **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 this Application. 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 this Application.

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

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

### **Google Conversion linker (Google Ireland Limited)**

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

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

Personal Data processed: Trackers; Usage Data.

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

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

## **Analytics**

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

### **Google Analytics 4 (Google LLC)**

Google Analytics 4 is a web analysis service provided by Google LLC 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 this Application, 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 their [partner policy](#) and their [Business Data page](#).

Personal Data processed: number of Users; session statistics; Trackers; Usage Data.

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

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

This processing constitutes:

- a Sale in the United States

### **Backup saving and management**

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

### **Sectigo CodeGuard (Sectigo Limited)**

Sectigo CodeGuard is a service to save and manage backups provided by Sectigo Limited.

Personal Data processed: various types of Data.

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

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

### **Building and running this Application**

Key components of this Application are built and run directly by the Owner by making use of the software listed below.

#### **WordPress (self-hosted) (this Application)**

This Application is built and run by the Owner via a CMS software (Content Management System) called WordPress.

Personal Data processed: Data communicated while using the service; password; Usage Data; username.

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

This processing constitutes:

- a Sharing in California

### **Contacting the User**

#### **Contact form (this Application)**

By completing the contact form with their information, the User authorizes this Application to use these details to respond to the inquiries (like quotes, and any other requests).

Personal Data processed: city; company name; country; date of birth; email address; fax number; field of activity; first name; last name; number of employees; phone number; physical address; state; Tax ID; Usage Data; various types of Data; VAT Number; website; ZIP/Postal code.

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

### **Mailing list or newsletter (this Application)**

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

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

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

### **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### **YouTube video widget (Google LLC)**

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

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

#### **Font Awesome (Fonticons, Inc. )**

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

Personal Data processed: Trackers; Usage Data.

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

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

#### **Google Fonts (Google LLC)**

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

Personal Data processed: Trackers; Usage Data.

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

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

#### **Google Maps Widget (Google Ireland Limited)**

Google Maps is a maps visualization service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

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

### **Heat mapping and session recording**

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

### **Microsoft Clarity (Microsoft Corporation)**

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

Personal Data processed: clicks; interaction events; session duration; Trackers; Usage Data.

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

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

### **Managing support and contact requests**

This type of service allows this Application to manage support and contact requests received via email or by other means, such as the contact form. The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

### **ZOHO Booking**

1. Personal Data Collected and Processing Methods To allow appointment booking (as "Data Subjects"), MetUp srl requires the completion of a form that collects the following data: Mandatory data: Last Name, Company, Email Address. Optional data: Phone Number.
2. Purpose and Legal Basis of Processing The personal data provided is collected and processed with the sole purpose of providing and managing the requested appointment. The legal basis legitimizing this processing is the performance of a contract or pre-contractual measures taken at the data subject's request. No processing will be carried out for marketing or profiling purposes, and the collection occurs via a single consent (opt-in) upon submitting the form, where not required.
3. Data Processor and Third Parties For the technical management of the calendar and bookings, MetUp srl is the data controller, Zoho Bookings process and safely store the data on behalf of the Data Controller MetUp srl.
4. Data Retention Period In compliance with the principles of necessity and proportionality, the personal data provided for the booking will be kept in our systems for a period of at least 10 years, in order to fulfill any legal, accounting, and administrative obligations related to the services provided.
5. Data Subject Rights The GDPR grants users specific rights over their personal data. Since bookings are made in "Guest" mode, data subjects can contact the MetUp srl administrator at any time to exercise the following rights: Right of Access: request confirmation of the existence of personal data and obtain its specifics. Right to Rectification: request the correction or updating of inaccurate data. Right to Erasure (Right to be Forgotten): request the deletion of their data from the systems, where applicable. Upon request sent via email, the MetUp srl administrator will manually delete it. To exercise these rights, the customer can send a written request via email to [it@metup.it](mailto:it@metup.it) of MetUp srl.

Personal Data processed: Trackers.

### **Remarketing and behavioral targeting**

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application 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 allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

### **Google Ads Remarketing (Google LLC)**

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

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

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

Personal Data processed: Trackers; Usage Data.

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

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

## Spam and bots protection

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

### Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

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

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information; inferences drawn from other personal information.

### Cloudflare Turnstile (Cloudflare, Inc.)

Cloudflare Turnstile is a spam protection service provided by Cloudflare, Inc.

Personal Data processed: browser fingerprint; browser information; IP address; Trackers; Usage Data.

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

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

## Tag management

This type of service helps the Owner to manage the tags or scripts needed on this Application 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 or by Google Ireland Limited, depending on how the Owner manages the Data processing.

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

Personal Data processed: Trackers; Usage Data.

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

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

## Traffic optimization and distribution

This type of service allows this Application to distribute their content using servers located across different countries and to optimize their performance. Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application 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.

### Bunny CDN (BunnyWay d.o.o.)

Bunny CDN is a traffic optimization and distribution service provided by BunnyWay d.o.o.

Personal Data processed: Usage Data.

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

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

## **Cloudflare (Cloudflare, Inc.)**

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc. The way Cloudflare is integrated means that it filters all the traffic through this Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

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

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

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

## **User database management**

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

## **ZOHO CRM (Zoho Corporation Pvt. Ltd.)**

ZOHO CRM is a User database management service provided by Zoho Corporation Pvt. Ltd.

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

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

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

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

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

## **Cookie Policy**

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

## **Further Information for Users**

### **Legal basis of processing**

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

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

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

### **Further information about retention time**

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

Therefore:

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

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

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

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

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

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

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

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

### **Details about the right to object to processing**

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

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

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

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

## **Further information for Users in Switzerland**

This section applies to Users in Switzerland, and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy.

Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the personal data, if any, the retention period and further information about Personal Data can be found in **the section titled "Detailed**

**information on the processing of Personal Data” within this document.**

## **The rights of Users according to the Swiss Federal Act on Data Protection**

Users may exercise certain rights regarding their Data within the limits of law, including the following:

- right of access to Personal Data;
- right to object to the processing of their Personal Data (which also allows Users to demand that processing of Personal Data be restricted, Personal Data be deleted or destroyed, specific disclosures of Personal Data to third parties be prohibited);
- right to receive their Personal Data and have it transferred to another controller (data portability);
- right to ask for incorrect Personal Data to be corrected.

### **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, providing Users with the information required by law.

## **Further information for Users in the United States**

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

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

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

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

### **Notice at collection**

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

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

### **Internet or other electronic network activity information**

**Personal Information collected or disclosed:** Usage Data, various types of Data as specified in the privacy policy of the service, Trackers, answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, Data communicated while using the service, number of Users, session statistics, first name, last name, date of birth, phone number, company name, physical address, fax number, country, state, email address, ZIP/Postal code, various types of Data, city, field of activity, number of employees, website, address, contact details, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), page views, interests, gender, device information, search history, session duration, interaction events, IP address, browser fingerprint, browser information

**Sensitive Personal Information collected or disclosed** ⓘ: password, username, VAT Number, Tax ID

### **Purposes:**

- Traffic optimization and distribution
- Displaying content from external platforms
- Spam and bots protection
- Tag management
- Building and running this Application
- Analytics
- Contacting the User
- Remarketing and behavioral targeting
- Advertising

- Heat mapping and session recording
- User database management

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Third-parties:** BunnyWay d.o.o., Cloudflare, Inc., Google LLC, Fonticons, Inc. , this Application, Microsoft Corporation, LinkedIn Corporation, Google Ireland Limited, Zoho Corporation Pvt. Ltd.

**Service providers or contractors:** this Application

## Identifiers

**Personal Information collected or disclosed:** various types of Data as specified in the privacy policy of the service, Trackers, Usage Data, Data communicated while using the service, first name, last name, date of birth, phone number, company name, physical address, fax number, country, state, email address, ZIP/Postal code, various types of Data, city, field of activity, number of employees, website, address, contact details, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), page views, interests, gender

**Sensitive Personal Information collected or disclosed** ⓘ: password, username, VAT Number, Tax ID

### Purposes:

- Traffic optimization and distribution
- Building and running this Application
- Contacting the User
- Advertising
- Backup saving and management
- User database management

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Third-parties:** Cloudflare, Inc., this Application, Google LLC, Sectigo Limited, Zoho Corporation Pvt. Ltd.

**Service providers or contractors:** this Application

## Inferences drawn from other personal information

**Personal Information collected or disclosed:** Usage Data, Trackers, answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, page views, interests, gender

### Purposes:

- Spam and bots protection
- Advertising

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Third-parties:** Google LLC

## Commercial information

**Personal Information collected or disclosed:** first name, last name, date of birth, phone number, company name, physical address, fax number, country, state, email address, ZIP/Postal code, various types of Data, city, field of activity, number of employees, website, Usage Data

**Sensitive Personal Information collected or disclosed** ⓘ: VAT Number, Tax ID

**Purposes:**

- Contacting the User

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Service providers or contractors:** this Application

**Employment related information**

**Personal Information collected or disclosed:** first name, last name, date of birth, phone number, company name, physical address, fax number, country, state, email address, ZIP/Postal code, various types of Data, city, field of activity, number of employees, website, Usage Data

**Sensitive Personal Information collected or disclosed** ⓘ: VAT Number, Tax ID

**Purposes:**

- Contacting the User

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Service providers or contractors:** this Application

**Geolocation data**

**Personal Information collected or disclosed:** city, ZIP/Postal code, state, province, country, county, latitude (of city), longitude (of city), metro area, geography/region, Usage Data, Trackers, IP address, device information, app information, device logs, operating systems, browser information, language, launches, number of sessions, session duration, scroll-to-page interactions, mouse movements, scroll position, keypress events, motion sensor events, touch events, video views, clicks, browsing history, search history, session statistics, page views, interaction events, page events, custom events, Application opens

**Purposes:**

- Spam and bots protection

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

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

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

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

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

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

**What are the sources of the Personal Information we collect?**

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

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

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

## Your privacy rights under US state laws

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

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

### Additional rights for Users residing in California

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

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

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

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

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

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

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

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

### Additional rights for users residing in Utah and Iowa

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

- **The right to opt out of** the processing of your Personal Information for **Targeted Advertising;**
- **The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal

Information is necessary for the provision of a product or service specifically requested by the consumer.

## **How to exercise your privacy rights under US state laws**

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

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

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

## **How to exercise your rights to opt out**

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

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

## **How and when we are expected to handle your request**

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

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

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

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

### **Legal action**

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

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

### **Additional information about User's Personal Data**

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

### **System logs and maintenance**

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

### **Information not contained in this policy**

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

### **Changes to this privacy policy**

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

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

## **Definitions and legal references**

### **Personal Data (or Data) / Personal Information (or Information)**

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

### **Sensitive Personal Information**

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

### **Usage Data**

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

### **User**

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

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

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

### **Data Controller (or Owner)**

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

### **This Application**

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

### **Service**

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

### **Sale**

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

### **Sharing**

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third**

**party for cross-context behavioral advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

### **Targeted advertising**

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

### **European Union (or EU)**

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

### **Cookie**

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

### **Tracker**

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

### **Legal information**

This policy has been prepared based on provisions of multiple legislations.

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

Latest update: June 17, 2026