# **Cookie Policy of Shani's Tutoring**

This document informs Users about the technologies that help this Application to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Application.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate.

For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Application uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information – such as the presence of other Trackers - in the linked privacy policies of the respective third-party providers or by contacting the Owner.

To find more information dedicated to Californian consumers and their privacy rights, Users may <u>read the privacy policy</u>.

# Activities strictly necessary for the operation of this Application and delivery of the Service

This Application uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

#### **Third-party Trackers**

#### 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 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.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

#### Handling payments

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

## Apple Pay (Apple Inc.)

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: billing address, email address, first name, last name, payment info, phone number, purchase history, shipping address, Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy.

## Other activities involving the use of Trackers

#### **Basic interactions & functionalities**

This Application uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

## Registration and authentication

By registering or authenticating, Users allow this Applica sates as the same of the same o

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Storage duration:

• PREF: 8 months

VISITOR\_INFO1\_LIVE: 8 monthsYSC: duration of the session

#### Instagram widget

Instagram is an image visualization service provided by Facebook, Inc. or by Facebook Ireland Ltd, 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: Tracker and Usage Data.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

## Spotify widget (Spotify AB)

Spotify is an audio content delivery service provided by Spotify AB that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Tracker and Usage Data.

Place of processing: Sweden - 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 this Application.

The interaction and information obtained through this Application 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 this Application 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: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

#### Storage duration:

AnalyticsSyncHistory: 1 monthJSESSIONID: duration of the session

UserMatchHistory: 1 month

bcookie: 1 yearbscookie: 1 year

lang: duration of the session

lidc: 1 day
lissc: 1 year
lms\_ads: 1 month
lms analytics: 1 month

#### Twitter Tweet button and social widgets (Twitter, Inc.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

· personalization id: 2 years

## Facebook Like button and social widgets

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing,

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Storage duration:

• fbp: 3 months

#### PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Tracker and Usage Data.

Place of processing: See the PayPal privacy policy - Privacy Policy.

Storage duration:

- · akavpau ppsd: duration of the session
- ts: duration of the session

#### Measurement

This Application uses Trackers to measure traffic and analyze User behavior with the goal of improving the Service.

## **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.

#### **Wordpress Stats**

Wordpress Stats is an analytics service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - <u>Privacy Policy</u>; Ireland - <u>Privacy Policy</u>.

Storage duration:

tk\_tc: duration of the session

#### **Google Analytics**

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 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.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

• AMP TOKEN: 1 hour

\_ga: 2 years • \_gac\*: 3 months • \_gat: 1 minute gid: 1 day

## **Google Analytics Advertising Reporting Features**

Google Analytics on this Application 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: Tracker, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

• IDE: 2 years • \_gcl\_\*: 3 months

· test cookie: 15 minutes

#### Pinterest Conversion Tag (Pinterest, Inc.)

Pinterest Conversion Tag is an analytics service provided by Pinterest, Inc. that connects data from the Pinterest advertising network with actions performed on this Application.

Users may opt out of behavioral advertising features through their device settings, their Pinterest personalization settings or by visiting the AdChoices opt-out page.

Personal Data processed: device information, Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt out.

Storage duration:

• pin unauth: 1 year

pinterest ct ua: duration of the session

#### **Google Analytics 4**

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.

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

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

\_ga: 2 years\_ga\_\*: 2 years

• \_gac\_gb\_\*: 3 months

• gid: 1 day

## **Anonymized analytics services**

The services contained in this section allow the Owner, through the use of third-party Trackers, to collect and manage analytics in an anonymized form.

#### Google Analytics with anonymized IP

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 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. 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: Tracker and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

• AMP TOKEN: 1 hour

\_ga: 2 years\_gac\*: 3 months\_gat: 1 minute\_gid: 1 day

#### **Targeting & Advertising**

This Application uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads.

## **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 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.

## **Amazon Advertising**

Amazon Advertising is an advertising service provided by Amazon Europe or by Amazon, depending on how the Owner manages the Data processing.

Personal Data processed: Tracker and Usage Data.

Place of processing: European Union - Privacy Policy - Opt out; United States - Privacy Policy - Opt out.

Storage duration:

ad-id: 10 monthsamzn-token: 7 daysvendor-id: 1 month

#### **Amazon Mobile Ads (Amazon)**

Amazon Mobile Ads is an advertising service provided by Amazon.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

ad-id: 10 monthsamzn-token: 7 daysvendor-id: 1 month

#### **Google AdSense**

Google AdSense is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. 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 Google's partner policy.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

#### Storage duration:

AID: 2 yearsANID: 2 years

• Conversion: 3 months

DSID: 14 days
FCNEC: 1 year
FLC: 10 seconds
FPAU: 3 months
FPGCLAW: 3 months
FPGCLDC: 3 months
FPGCLGB: 3 months

IDE: 2 years
NID: 6 months
RUL: 1 year
TAID: 14 days
\_gads: 2 years
\_gsas: 2 years
\_gac\_: 3 months
\_gc\_au: 3 months

\_gcl\_aw: 3 months \_gcl\_dc: 3 months \_gcl\_gb: 3 months

• \_gcl\_gf: 3 months

• \_gcl\_ha: 3 months

• id: 2 years

test\_cookie: 15 minutes

#### Impact (Impact Tech, Inc.)

Impact is an advertising service provided by Impact Tech, Inc.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration: up to 2 years

#### Jetpack (Jetpack Digital LLC)

Jetpack is an advertising service provided by Jetpack Digital LLC.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy - Opt out.

Storage duration:

• JP:\*: indefinite

#### Media.net (Media.net Advertising FZ-LLC)

Media.net is an advertising service provided by Media.net Advertising FZ-LLC.

Personal Data processed: Tracker and Usage Data.

Place of processing: United Arab Emirates - Privacy Policy - Opt out.

#### Storage duration:

• \_mNExInsl: 7 days

\_mNIDShownPrev: 7 days

• \_mNInsChk: duration of the session

\_mNInsl: 7 days
\_mNIntDock: 7 days
\_mNOvl: 7 days
\_mNOvlShown: 7 days

addtl consent: 2 years

• atst: 7 days

• bids\_map\_v2: indefinite

covkn: indefinite
crtkn: indefinite
data-\*: 1 year
eclstest: indefinite
euconsent-v2: 2 years

• gdpr\_oli: 2 years

• mnet\_ad\_pref\_close: 30 minutes

mnet\_optout: 6 years

• mnet session depth: duration of the session

mnsbucketExpiryTime: indefinite
mnsbucketName: indefinite
mnstestVersion: indefinite
mnvid day cap: 1 day

• mnvid ses cap: duration of the session

ra\_depth\_tracking: 15 minutes
session\_depth: 30 minutes
usp\_status: 7 months
usprivacy: 2 years
visitor-id: 1 year

• x-msedge-clientid: indefinite

## Pinterest Ads (Pinterest, Inc.)

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

Users may opt out of behavioral advertising features through their device settings, their Pinterest personalization settings.

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

Place of processing: United States - Privacy Policy - Opt out.

# Storage duration:

\_pin\_unauth: 1 year

pinterest ct ua: duration of the session

## PubMatic (PubMatic, Inc.)

PubMatic is an advertising service provided by PubMatic, Inc.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out.

#### Storage duration:

COKENBLD: 1 dayDPFQ: 3 monthsDPPIX ON: 20 seconds

- DPSync2: 3 months
- DPSync3: 3 monthsFPtrust: duration of the session
- HPAUSRBK\_: duration of the session
- KADUSERCOOKIE: 3 months
- KCCH: 30 seconds
- KRTBCOOKIE [DSPID]: 3 months
- KTPCACOOKIE: 3 months
- PM-UL-Sync: 3 months
- PMDTSHR: 1 day
- PMFREQ ON: 2 seconds
- PUBMDCID: 3 months
- PUBRETARGET: 3 months
- PUBUIDSYNCUPFO: 3 months
- PugT: 1 month
- R [DSPID]: 3 months
- SPugT: 1 month
- SSCS: 1 day
- SYNCUPPIX\_ON: 20 seconds
- SyncRTB2: 3 months
- SyncRTB3: 3 months
- TEMPHPAUSRBKCNT\_: 1 day
- UND: 1 hour
- USCC: 1 day
- curtime: 2 days
- aid key: indefinite
- camfreq\_: 4 days
- chk: 3 months
- chkChromeAb67: 3 months
- chkChromeAb67Sec: 3 months
- · chkSecSet: 3 months
- dV: 3 minutes
- ipc: 3 seconds
- · limited tracking ad key: indefinite
- optout: 5 years
- pi: 8 seconds
- pp: 3 months
- pubfreq\_: 4 days
- pubtime\_: 1 day
- repi: 2 seconds
- uids: 3 months

## AppNexus (AppNexus Inc.)

AppNexus is an advertising service provided by AppNexus Inc.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt out.

## Storage duration:

- anj: 3 months
- icu: 3 months
- pses: duration of the sessionsess: duration of the session
- uids: 3 monthsusersync: 3 months
- uuid2: 3 months

## Criteo (Criteo SA)

Criteo is an advertising service provided by Criteo SA.

Personal Data processed: Trackers and Usage Data.

Place of processing: France – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

criteo\_fast\_bid: 7 days

criteo\_fast\_bid\_expires: 7 days

cto\_bundle: 2 years
cto\_bundle: indefinite
cto\_optout: 5 years
cto\_optout: indefinite

optout: 5 yearsuid: 2 years

#### Teads (Teads SA)

Teads is an advertising service provided by Teads SA.

Personal Data processed: Trackers and Usage Data.

Place of processing: Luxembourg - Privacy Policy - Opt out.

## Storage duration:

tt\_bluekai: 1 day
tt\_dar: 1 day
tt\_emetriq: 1 day
tt\_exelate: 1 day
tt\_liveramp: 1 day
tt\_neustar: 1 day
tt\_retargetly: 1 day
tt\_salesforce: 1 day
tt\_skp: 1 day
tt\_viewer: 1 year

#### **Google Ad Manager**

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, 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.

In order to understand Google's use of Data, consult Google's partner policy.

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.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - <u>Privacy Policy</u>; Ireland - <u>Privacy Policy</u>.

#### Storage duration:

AID: 2 yearsANID: 2 years

· Conversion: 3 months

DSID: 14 days
FCNEC: 1 year
FLC: 10 seconds
FPAU: 3 months
FPGCLAW: 3 months

FPGCLAW: 3 monthsFPGCLDC: 3 monthsFPGCLGB: 3 months

IDE: 2 years
NID: 6 months
RUL: 1 year
TAID: 14 days
\_\_gads: 2 years
\_\_gsas: 2 years
\_gac\_: 3 months

\_gac\_gb\_: 3 months \_gcl\_au: 3 months

\_gcl\_aw: 3 months \_gcl\_dc: 3 months

\_gcl\_gb: 3 months \_gcl\_gf: 3 months \_gcl\_ha: 3 months

• id: 2 years

• test\_cookie: 15 minutes

## **Commercial affiliation**

This type of service allows this Application to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with this Application.

For details of which data are collected, please refer to the privacy policy of each service.

#### **Amazon Affiliation (Amazon)**

Amazon Affiliation is a commercial affiliation service provided by Amazon.com Inc.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

#### ShareAsale (ShareAsale.com Inc.)

ShareAsale is a banner commercial affiliation service provided by ShareAsale.com Inc.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

## CJ Affiliate by Conversant (Conversant LLC)

CJ Affiliate by Conversant is a commercial affiliation service provided by Conversant, Inc.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

• cje: 2 years

## eBay Partner Network (eBay, Inc.)

eBay Partner Network è un servizio di affiliazione commerciale fornito da eBay, Inc.

Personal Data processed: Tracker and 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.

## OneSignal (Lilomi, Inc.)

OneSignal is a message sending service provided by Lilomi, Inc.

OneSignal allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments. Depending on the permissions granted to this Application, the Data collected may also include precise location (i.e. GPS-level data) or WiFi information, apps installed and enabled on the User's device. This Application uses identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the OneSignal service.

The Data collected may be used by the service provider for interest-based advertising, analytics

# and market research. In order to understand OneSignal's use of Data, consult <u>OneSignal's privacy policy</u>.

#### **Push notifications opt-out**

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for some or all of the apps on the particular device.

#### Interest-based advertising opt-out

Users may opt-out of OneSignal advertising features through applicable device settings, such as the device advertising settings for mobile phones. Different device configurations, or updates to devices, may affect or change how these indicated settings work.

Personal Data processed: email address, geographic position, language, Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy - Opt out.

## How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences and withdraw their consent via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

## **Locating Tracker Settings**

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

## How to opt out of interest-based advertising

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

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

## Consequences of denying consent

Users are free to decide whether or not to grant consent. However, please note that Trackers help this Application to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, in the absence of the User's consent, the Owner may be unable to provide related features.

#### **Owner and Data Controller**

Shani Thanki-Franklin Shani's Tutoring

Owner contact email: hello@shanistutoring.com

Since the use of third-party Trackers through this Application cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Application.

## **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 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 Data Supervisor)**

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.

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

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

#### Cookie

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

#### **Tracker**

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

## **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

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

Latest update: August 12, 2022