

Privacy Policy of www.cluxter.it

This Application collects some Personal Data from its Users.

Owner and Data Controller

CLUXTER SRL SOCIETA' BENEFIT
Via Charta 77, n. 15 - 50018 - Firenze
ITALIA

Owner contact email: info@cluxter.it

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Tracker; Usage Data; email address; first name; last name; county; country; ZIP/Postal code; gender; date of birth; city; website; phone number; VAT Number; company name; state; various types of Data; Tax ID; field of activity; User ID; username; device information; Data communicated while using the service; physical address; Email; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); password; language; geographic position; picture; profile picture; geography/region; answers to questions; name; contact info.

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: Access to third-party accounts, Analytics, Displaying content from external platforms, Tag Management, Contacting the User, Interaction with external social networks and platforms, Content performance and features testing (A/B testing), Advertising, Beta Testing, Content commenting, Social features, Registration and authentication, Hosting and backend infrastructure, RSS feed management, Collection of privacy-related preferences, Managing data collection and online surveys, Interaction with live chat platforms, Remarketing and behavioral targeting, Handling activities related to productivity, Managing contacts and sending messages and Platform services and hosting.

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

Facebook permissions asked by this Application

This Application may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows this Application to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the [Facebook permissions documentation](#) and to the [Facebook privacy policy](#).

The permissions asked are the following:

Basic information

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

Activities

Provides access to the User's list of activities.

Birthday

Provides access to the birthday.

Contact email

Access the User's contact email address.

Current City

Provides access to the User's current location.

Email

Provides access to the User's primary email address.

Friends' About Me

Provides access to the 'About Me' section of the friends' profile.

Gender

Provides access to the User's gender.

Groups

Provides access to the list of groups the User is a member of.

Hometown

Provides access to the User's hometown.

Instagram basic

Allows reading an Instagram account profile information and media.

User Timeline Posts Access

Provides access to the posts on a Users's timeline.

Detailed information on the processing of Personal Data

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

Access to third-party accounts

This type of service allows this Application to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorization by the User.

Facebook account access (Meta Platforms, Inc.)

This service allows this Application to connect with the User's account on the Facebook social network, provided by Facebook, Inc.

Permissions asked: Activities; Birthday; Contact email; Current City; Email; Friends' About Me; Gender; Groups; Hometown; Instagram basic; User Timeline Posts Access.

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

Linkedin account access (LinkedIn Corporation)

This service allows this Application to connect with the User's account on LinkedIn, provided by LinkedIn Corporation.

Personal Data processed: Tracker; Usage Data.

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

Google Drive account access (Google Ireland Limited)

This service allows this Application to connect with the User's account on Google Drive, provided by Google Ireland Limited.

Personal Data processed: Data communicated while using the service; device information; email address; first name; last name; Tracker; Usage Data; username.

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

Mailchimp account access (Intuit Inc.)

This service allows this Application to connect with the User's account on Mailchimp, provided by Intuit Inc.

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

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

OneDrive account access (Microsoft Corporation)

This service allows this Application to connect with the User's account on OneDrive, provided by Microsoft Corporation.

Personal Data processed: Tracker; various types of Data.

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

Pinterest account access (Pinterest, Inc.)

This service allows this Application to connect with the User's account on Pinterest, provided by Pinterest, Inc.

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

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

Twitter account access (X Corp.)

This service allows this Application to connect with the User's account on the Twitter social network, provided by Twitter, Inc.

Personal Data processed: Data communicated while using the service; device information; email address; first name; last name; password; Tracker; Usage Data; username.

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

Youtube account access (Google LLC)

This service allows this Application to connect with the User's account on Youtube, provided by Google LLC.

Personal Data processed: Tracker; Usage Data.

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

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on 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.

Query Click (Query Click Limited)

Query Click is an advertising service provided by Query Click Limited.

Personal Data processed: Tracker; Usage Data.

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

AdElement (AdElement Media Solutions Pvt Ltd)

AdElement is an advertising service provided by AdElement Media Solutions Pvt Ltd.

Personal Data processed: Tracker; Usage Data.

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

Direct Email Marketing (DEM) (this Application)

This Application uses the User Data to propose services and products provided by third parties or unrelated to the product or service provided by this Application.

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

Google AdSense (Google Ireland Limited)

Google AdSense is an advertising service provided by Google Ireland Limited. 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: Trackers; Usage Data.

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

LinkedIn Ads (LinkedIn Ireland Unlimited Company)

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

Personal Data processed: Trackers; Usage Data.

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

Google Ads conversion tracking (Google Ireland Limited)

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

Personal Data processed: Trackers; Usage Data.

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

Analytics

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

Google Analytics (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited (“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; Usage Data.

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

Google Analytics with anonymized IP (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited (“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; Usage Data.

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

Beta Testing

This type of service makes it possible to manage User access to this Application, or parts of it, for the purpose of testing a certain feature or the entire Application.

The service provider may automatically collect data related to crashes and statistics related to the User's use of this Application in a personally identifiable form.

App Center (Microsoft Corporation)

App Center is a beta testing service provided by Microsoft Corporation. This Application may also send push notifications to the User.

Personal Data processed: country; Data communicated while using the service; device information; email address; language; phone number; Usage Data; User ID.

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

Collection of privacy-related preferences

This type of service allows this Application to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information, and in particular to the use of Cookies and other Trackers on this Application.

Personal Data processed: Trackers.

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

Contacting the User

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: city; country; county; date of birth; email address; first name; gender; last name; Tracker; Usage Data; website; ZIP/Postal code.

Contact form (this Application)

By filling in the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: city; company name; country; county; email address; field of activity; first name; gender; last name; phone number; state; Tax ID; User ID; various types of Data; VAT Number; website; ZIP/Postal code.

Phone contact (this Application)

Users that provided their phone number might be contacted for commercial or promotional purposes related to this Application, as well as for fulfilling support requests.

Personal Data processed: phone number.

Content commenting

Content commenting services allow Users to make and publish their comments on the contents of this Application. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

Facebook Comments (Facebook Ireland Ltd)

Facebook Comments is a content commenting service provided by Facebook Ireland Ltd enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Tracker; Usage Data.

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

Content performance and features testing (A/B testing)

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

Google Optimize (Google Ireland Limited)

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

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

Personal Data processed: Tracker; Usage Data.

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

Google Optimize 360 (Google Ireland Limited)

Google Optimize 360 is an A/B testing service provided by Google Ireland Limited ("Google").

This service allows the Owner to target groups of Users on the base of their past use of this Application. Users that [opt-out](#) of tracking by Google Analytics will not be included in experiments created in Google Optimize 360.

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

Personal Data processed: Tracker; Usage Data.

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

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Fonts (Google Ireland Limited)

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

Personal Data processed: Tracker; Usage Data.

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

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: Usage Data.

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

Handling activities related to productivity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question.

These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

Gmail (Google Ireland Limited)

Gmail is a service that manages email communication provided by Google Ireland Limited. Such email communication is not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside this service for advertising purposes in any other way.

Personal Data processed: city; email address; first name; gender; last name; phone number.

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

Hosting and backend infrastructure

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

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Google BigQuery

Google BigQuery is a hosting and backend service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

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

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

Facebook Like button and social widgets (Facebook Ireland Ltd)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook Ireland Ltd

Personal Data processed: Tracker; Usage Data.

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

Twitter Tweet button and social widgets (X Corp.)

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

Personal Data processed: Tracker; Usage Data.

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

Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Application, in order to contact and be contacted by this Application's support service.

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

Facebook Messenger Customer Chat (Meta Platforms Ireland Limited)

The Facebook Messenger Customer Chat is a service for interacting with the Messenger instant messaging app and platform provided by Meta Platforms Ireland Limited.

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

Place of processing: Ireland – [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.

Mailchimp (Intuit Inc.)

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: company name; country; email address; first name; gender; last name; phone number; various types of Data.

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

Managing data collection and online surveys

This type of service allows this Application to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

Data provided via online forms, managed directly (this Application)

This Application makes use of online forms that can be used to collect Data about Users.

Personal Data processed: answers to questions; city; contact info; country; email address; first name; gender; last name; name; Trackers.

Meta lead ads (Meta Platforms Ireland Limited)

Meta lead ads is an advertising and data collection service provided by Meta Platforms Ireland Limited that allows form-based ads to be shown to Users pre-populated with Personal Data from their Facebook profiles, such as names and email addresses. Depending on the type of advertisement, Users may be requested to provide further information.

Form submission results in the collection and processing of these Data by the Owner under this privacy policy, and only for the specific purpose outlined on the form and/or inside this privacy policy, where provided.

Users may exercise their rights, at any time, including the right to withdraw their consent to the processing of their Data, as specified in the section containing information about User rights in this privacy policy.

Personal Data processed: city; company name; country; Data communicated while using the service; email address; first name; last name; phone number; state.

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

Platform services and hosting

These services have the purpose of hosting and running key components of this Application, therefore allowing the provision of this Application from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

WordPress.com (Aut O'Mattic A8C Ireland Ltd.)

WordPress.com is a platform provided by Aut O'Mattic A8C Ireland Ltd. that allows the Owner to build, run and host this Application.

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

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

Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Sign in with Apple (Apple Inc.)

Sign in with Apple is a registration and authentication service provided by Apple Inc. In cases where Users are required to provide their email address, Sign in with Apple may generate a private relay address on behalf of Users that automatically forwards messages to their verified personal email account - therefore shielding their actual email address from the Owner.

Personal Data processed: city; country; date of birth; email address; first name; geography/region; last name; password; phone number; profile picture; User ID.

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

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 offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Facebook Remarketing (Meta Platforms Ireland Limited)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms Ireland Limited that connects the activity of this Application with the Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google Ireland Limited 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: Ireland – [Privacy Policy](#) – [Opt Out](#).

RSS feed management

This type of service allows this Application to manage RSS feeds and the distribution of their content. Depending on the characteristics of the service used, these services may be used to insert ads within the content and to gather statistics data from them.

Feedburner

Feedburner is a service to manage RSS feeds provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. It allows the collection of statistics on what content is consumed and to insert ads in it.

Personal Data processed: Tracker; Usage Data.

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

FeedPress (Beta Et Compagnie Sarl)

FeedPress is a service to manage RSS feeds provided by Beta Et Compagnie Sarl. It allows the collection of statistics on what content is consumed.

Personal Data processed: Usage Data.

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

Social features

Inviting and suggesting friends (this Application)

This Application may use the Personal Data provided to allow Users to invite their friends - for example through the address book, if access has been provided - and to suggest friends or connections inside it.

Personal Data processed: various types of Data.

Public profile (this Application)

Users may have public profiles that other Users can display. In addition to the Personal Data provided, this profile may contain Users' interactions with this Application.

Personal Data processed: city; country; county; date of birth; email address; first name; geographic position; last name; phone number; picture.

Firestore Invites (Google Ireland Limited)

Firestore Invites is a social feature provided by Google Ireland Limited that enables Users to share this Application. The sharing may contain referral codes, or content from within this Application and may be done via email or SMS. Sharing is tracked with Google Analytics for Firestore, which informs the Owner that the User has opened or installed this Application via invite.

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

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

Firestore Dynamic Links (Google Ireland Limited)

Firestore Dynamic Links is a social feature provided by Google Ireland Limited. Dynamic Links are tracked within Firestore or Google Analytics for Firestore, which informs the Owner about the details of the User journey to and within this Application.

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

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

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 Ireland Limited)

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

Personal Data processed: Tracker; Usage Data.

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

Adobe Launch (Adobe Systems Incorporated)

Adobe Launch is a tag management service provided by Adobe Systems Incorporated.

Personal Data processed: Usage Data.

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

Segment (Segment Inc.)

Segment is a tag management service provided by Segment.io, Inc.

Personal Data processed: Tracker; Usage Data.

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

Information on opting out of interest-based advertising

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

Further information about the processing of Personal Data

Preference Cookies

Preference Cookies store the User preferences detected on this Application in the local domain such as, for example, their timezone and region.

Personal Data collected through sources other than the User

The Owner of this Application may have legitimately collected Personal Data relating to Users without their knowledge by reusing or sourcing them from third parties on the grounds mentioned in the section specifying the legal basis of processing. Where the Owner has collected Personal Data in such a manner, Users may find specific information regarding the source within the relevant sections of this document or by contacting the Owner.

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.

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)

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 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.

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.

Email

Provides access to the User's primary email address.

Legal information

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

Latest update: March 08, 2024