

# Privacy Policy of [www.testsite.com]

Last updated: [date]

We are [Company Name]. This privacy policy outlines how we collect, use, and protect your personal information when you use our services.

You can contact us at [email address].

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## INTRODUCTION

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**What is this policy about?** This document explains how this website collects, uses, and protects your personal data to achieve the purposes outlined in this document.

**What is personal data?** Personal data refers to information that can be used to identify you directly or indirectly. This includes details such as first name, last name, email address, tracking technologies (like cookies or tracking pixels), user activity, and device information. You can find detailed information on each type of personal data collected in dedicated sections of this privacy policy or in text shown before data is collected.

## CONTACT INFORMATION

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**Address:** [Street Address] [City, State ZIP Code] [Country]

**Email:** [email address]

**Phone:** [phone number]

# TYPES OF DATA COLLECTED

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The types of personal data that this website collects, by itself or through third parties, may include:

- first name,
- last name,
- email address,
- Trackers,
- Usage data.

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 you, or, in case of Usage data, collected automatically when using this website. Unless specified otherwise, all data requested by this website is mandatory and failure to provide this data may make it impossible for this website to provide its services.

Any use of cookies or of other tracking tools by this website or by the owners of third-party services used by this website serves the purpose of providing the service required by you, in addition to any other purposes described in the present document.

You are responsible for any third-party personal data obtained, published or shared through this website.

# MODE AND PLACE OF PROCESSING PERSONAL DATA

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**Methods of processing** We take 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. The data may also be accessible to external parties appointed, if necessary, as data processors by us. The updated list of these parties may be requested from us at any time using the contact details provided in this document.

**Place** The data is processed at our operating offices and in any other places where the parties involved in the processing are located. Depending on your location, data transfers may involve transferring your data to a country other than your own.

**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 your consent.

# DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

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Your personal data is collected to allow us to provide our service, comply with our legal obligations, respond to enforcement requests, protect our rights and interests (or yours or

those of third parties), detect any malicious or fraudulent activity, as well as the purposes set out below.

**Note:** *The services listed below are examples of common data processors. You must add a clause for every third-party service you use that collects personal data — including analytics tools, advertising networks, payment providers, and embedded content. Remove any examples that do not apply to your website.*

## **Analytics**

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

### **Google Analytics (Universal Analytics) (Google LLC)**

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC ("Google"). Google utilizes the data collected to track and examine the use of this website, 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. To understand Google's use of data, consult Google's partner policy (<https://policies.google.com/technologies/partner-sites>) and their Business data page (<https://business.safety.google/privacy/>).

**Personal data processed:** Trackers; Usage data **Place of processing:** United States  
**Privacy policy:** <https://business.safety.google/privacy/> **Opt-out link:** <https://tools.google.com/dlpage/gaoptout>

Category of personal information collected according to the CCPA: internet or other electronic network activity information. This processing constitutes a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA.

## **Displaying content from external platforms**

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

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

Google Fonts is a typeface visualization service provided by Google LLC that allows this website to incorporate content of this kind on its pages. To understand Google's use of data, consult Google's partner policy (<https://policies.google.com/technologies/partner-sites>) and their Business data page (<https://business.safety.google/privacy/>).

**Personal data processed:** Trackers; Usage data **Place of processing:** United States  
**Privacy policy:** <https://business.safety.google/privacy/> **Opt-out link:** <https://tools.google.com/dlpage/gaoptout>

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

## **Contacting you**

**Contact form (this website)**

By filling in the contact form with your data, you authorize this website to use these details to reply to your requests for information, quotes or any other kind of request as indicated by the form's header.

Personal data processed: email address; first name; last name

Category of personal information collected according to the CCPA: identifiers. This processing constitutes: a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA.

## FURTHER INFORMATION

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### Legal basis of processing

- We may process personal data relating to you if you have given your consent or for one or more specific purposes: provision of data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof,
- processing is necessary for compliance with a legal obligation to which we are subject,
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us,
- processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

In any case, we will gladly help to clarify the specific legal basis that applies to the processing, and whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### How long we keep your information

When we collect your personal information, we keep it for as long as required for the purposes we collected for. Sometimes, we might need to keep your personal information longer due to a legal obligation or based on your consent. We will keep your personal information based on the purposes and reasons set out below:

- **for contractual purposes:** if we have concluded a contract with you, then we'll keep your information until the contract has been performed in full.
- **for our legitimate interests:** if we're using your personal information for purposes necessary and relevant to our business operations, we'll keep it as long as we need it for those purposes.
- **with your consent:** we may retain personal data for a longer period whenever you have given consent to such processing, unless you withdraw your consent.
- **legal obligations:** we may be obliged to retain personal data for a longer period whenever required to fulfill a legal obligation or upon order of an authority.

Once the retention period expires, your personal data will 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.

# YOUR RIGHTS BASED ON THE GENERAL DATA PROTECTION REGULATION (GDPR)

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You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following, to the extent permitted by law:

- **Withdraw your consent at any time.** You have the right to withdraw consent where you have previously given your consent to the processing of your personal data.
- **Object to processing of your data.** You have the right to object to the processing of your data if the processing is carried out on a legal basis other than consent. If your personal data is being processed for direct marketing purposes, you can object at any time, free of charge and without any reason.
- **Access your data.** You have the right to learn if data is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.
- **Verify and seek rectification.** You have the right to verify the accuracy of your data and ask for it to be updated or corrected.
- **Restrict the processing of your data.** You have the right to restrict the processing of your data. In this case, we will not process your data for any purpose other than storing it.
- **Have your personal data deleted or otherwise removed.** You have the right to obtain the erasure of your data from us.
- **Receive your data and have it transferred to another controller.** You have the right to receive your 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.** You have the right to bring a claim before your competent data protection authority.

## How to exercise these rights

Any requests to exercise your rights can be directed to us using the contact details provided at the start of this document. Such requests are free of charge and will be answered by us as early as possible, providing you with the information required by law.

***Note:** If you have users in the EU or EEA, the General Data Protection Regulation (GDPR) applies to your business. The section above covers the core rights you must include. For a complete GDPR-specific privacy policy template with all required disclosures, see our GDPR privacy policy template:  
<https://www.iubenda.com/en/blog/gdpr-privacy-policy-template/>*

## FURTHER INFORMATION IF YOU RESIDE IN SWITZERLAND

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**Note:** If you have users in Switzerland, the Swiss Federal Act on Data Protection (FADP) requires additional disclosures. Add a dedicated section covering: the right to access personal data, the right to object to processing, the right to data portability, and the right to request correction of inaccurate data. You can contact us at any time using the contact details provided at the start of this document to exercise these rights.

## FURTHER INFORMATION IF YOU RESIDE IN BRAZIL

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**Note:** If you have users in Brazil, the Lei Geral de Proteção de Dados Pessoais (LGPD) applies. Add a section covering: the legal bases for processing, your Brazilian privacy rights (access, rectification, deletion, portability, and the right to revoke consent), and how users can file a request with the ANPD. You can contact us at any time using the contact details at the start of this document.

## FURTHER INFORMATION IF YOU RESIDE IN CALIFORNIA

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This section applies to all consumers residing in California, United States of America, according to the California Consumer Privacy Act of 2018 (the "CCPA"), as updated by the California Privacy Rights Act (the "CPRA") and subsequent regulations. For such consumers, this section supersedes any other possibly divergent or conflicting information contained in the privacy policy. This part of the document uses the term "personal information" as defined in the CCPA/CPRA.

### Categories of personal information that we collect

- We have collected the following categories of personal information about you: identifiers, and internet or other electronic network activity information.
- We do not collect sensitive personal information.
- We will not collect additional categories of personal information without notifying you.

### How we use your personal information

We may use your personal information to allow the operational functioning of this website and features thereof, for commercial purposes, and for complying with the law. We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

### Sale or sharing of your personal information

We sell or share your personal information with third parties listed in the "Detailed information on the processing of personal data" section. You have the right to opt out of the sale or sharing of your personal information at any time by contacting us using the details provided at the start of this document, or via the privacy choices link on this website. If you want to submit opt-out requests via a Global Privacy Control (GPC) signal, we will abide by such request. Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

## Your privacy rights under the CCPA/CPRA and how to exercise them

- **The right to know:** request that we disclose the categories and specific pieces of personal information we have collected, the sources, the purposes, and the third parties with whom we share it.
- **The right to delete:** request that we delete your personal information, subject to legal exceptions.
- **The right to correct:** request that we correct inaccurate personal information we maintain about you.
- **The right to opt out:** opt out of the sale or sharing of your personal information and limit the use of your sensitive personal information.
- **The right to non-discrimination:** we will not discriminate against you for exercising any of your rights under the CCPA.

To exercise these rights, submit a verifiable request to us via the contact details at the start of this document. We will confirm receipt within 10 days and respond within 45 days (up to 90 days if needed). We do not charge a fee unless your request is manifestly unfounded or excessive.

***Note:** For a dedicated CCPA-specific template with all required disclosures, see our CCPA privacy policy template: <https://www.iubenda.com/en/blog/ccpa-privacy-policy-template/>*

## FURTHER INFORMATION IF YOU RESIDE IN A US STATE WITH DATA PRIVACY LAWS

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***Note:** Several US states have enacted data privacy laws with requirements similar to the CCPA. If you have users in states such as Virginia, Colorado, Connecticut, or Utah, add a dedicated section for each applicable state. Each section should cover: the categories of personal data you collect, the purposes of processing, your data sale and sharing practices, users' rights to access, correct, delete, and opt out of data sales, and how to submit a request. Contact details at the start of this document apply for all requests.*

# ADDITIONAL INFORMATION ABOUT DATA COLLECTION AND PROCESSING

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**Legal action** Your personal data may be used for legal purposes by us in Court or in the stages leading to possible legal action arising from improper use of this website or the related services. You declare to be aware that we may be required to reveal personal data upon request of public authorities.

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

**Changes to this privacy policy** We reserve the right to make changes to this privacy policy at any time by notifying you on this page and possibly within this website and/or — as far as technically and legally feasible — sending a notice to you via any contact information available to us. 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 based on your consent, we shall collect new consent from you, where required.

## DEFINITIONS AND LEGAL REFERENCES

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**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 (in other words, you).

**Usage data** Usage data is information automatically collected through this website or third-party services, including your IP address, browser type, operating system, time and method of requests, response status, visit duration, page sequence, and device-specific details.

**This website** The means by which your personal data is collected and processed.

**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 your browser.

**Tracker** Tracker indicates any technology — e.g. cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting — that enables the tracking of you, for example by accessing or storing information on your device.

**Legal information** This privacy statement has been prepared based on provisions of multiple legislations. This privacy policy relates solely to this website, if not stated otherwise within this document.