

Privacy Policy www.flightback.it

This Application collects some Personal Data from its Users.

Data Controller

GEIS Management Group S.r.l.

Corso Bruno Buozzi, 112 - 80147 Barra - Naples

Owner contact email: info@geisgroup.it

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are:

Tracking Tools; Usage Data; email; name; surname; date of birth; telephone number; various types of Data; Data communicated during the use of the service; session statistics; Email; name; unique device identifiers for advertising (Google Advertiser ID or IDFA identifier, for example).

Full details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the data is collected.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically when using this Application. Unless otherwise specified, all Data requested by this Application are mandatory. If the User refuses to communicate them, it may be impossible for this Application to provide the Service. In cases where this Application indicates some Data as optional, Users are free to refrain from communicating such Data, without any consequence on the availability of the Service or on its operation.

Users who have doubts about which Data are mandatory, are encouraged 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, unless otherwise specified, is intended to provide the Service requested by the User, in addition to the additional purposes described in this document and in the Cookie Policy, if available.

The User assumes the responsibility of the Personal Data of third parties obtained, published or shared through this Application and guarantees to have the right to communicate or disseminate them, freeing the Owner from any liability to third parties.

Mode and place of processing of the collected data

Processing methods

The Data Controller adopts appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

The processing is carried out using IT and / or telematic tools, with organizational methods and with logic 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 PA. of the Data Controller. The updated list of Data Processors can always be requested from the Data Controller.

Legal basis of the processing

The Data Controller processes Personal Data relating to the User if one of the following conditions exists:

- the User has given consent for one or more specific purposes; Note: in some jurisdictions the Data Controller may be authorized to process Personal Data without the User's consent or another of the legal bases specified below or, as long as the User does not object ("opt-out") to such processing. However, this is not applicable if the processing of Personal Data is governed by European legislation on the protection of Personal Data; the processing is necessary either for the execution of a contract with the User and / or for the execution of pre-contractual measures;
- the processing is necessary to fulfill a legal obligation to which the Data Controller is subject; the processing is necessary for the performance of a task carried out in the public interest or in the exercise of public authority vested in the Data Controller; the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties.
- However, it is always possible to ask the Data Controller to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, provided for by a contract or necessary to conclude a contract.

Place

The Data are processed at the operational headquarters of the Data Controller and in any other place where the parties involved in the processing are located. For more information, contact the Data Controller.

Your Personal Data may be transferred to a country other than the one in which you are located. To obtain further information on the place of processing, the User can refer to the section relating to the details on the processing of Personal Data.

The User has the right to obtain information regarding the legal basis for the transfer of Data outside the European Union or to an international organization of public international law or consisting of two or more countries, such as the UN, as well as regarding the security measures adopted by the Data Controller to protect the Data.

The User can verify that one of the transfers described above takes place by examining the section of this document relating to the details on the processing of Personal Data or request information from the Data Controller by contacting him at the details indicated at the beginning.

Conservation period

The Data are processed and stored for the time required by the purposes for which they were collected.

Therefore:

- Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of this contract is completed.
- Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until the satisfaction of this interest. The User can obtain further information regarding the legitimate interest pursued by the Owner in the relevant sections of this document or by contacting the Data Controller.

When the processing is based on the User's consent, the Data Controller may keep the Personal Data longer until such consent is revoked. Furthermore, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, Personal Data will be deleted. Therefore, at the end of this term, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

Purpose of the processing of collected data

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: Analytics, Displaying content from external platforms, Management of tags, Contacting the User, Management of data collection and online surveys, Productivity management, Advertising, Remarketing and behavioral targeting, Content performance testing and functionality (A/B testing), Heat mapping and session recording, Interaction with data collection platforms and other third parties and Collection of privacy preferences.

To obtain detailed information on the purposes of the processing and on the Personal Data processed for each purpose, the User can refer to the "Details on the processing of Personal Data" section.

Details on the processing of Personal Data

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

Contacting the User

Mailing list or newsletter (this Application)

By registering to the mailing list or newsletter, the User's email address is automatically added to a list of contacts to which email messages containing information, including commercial and promotional information, relating to this Application may be transmitted. The User's email address may also be added to this list as a result of registering with this Application or after making a purchase.

Personal Data processed: surname; email; name.

Categories of personal information collected under the CCPA: identifiers.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

Contact form (this Application)

By filling in the contact form with their Data, the User consents to their use to respond to requests for information, quotes, or any other nature indicated by the form header.

Personal Data processed: surname; Date of birth; email; name; phone number; various types of data.

Category of personal information collected under the CCPA: identifiers.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

Contact by phone (this Application)

Users who have provided their phone number may be contacted for commercial or promotional purposes related to this Application, as well as to satisfy support requests.

Personal data processed: telephone number.

Category of personal information collected under the CCPA: identifiers.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

Tag Management

This type of service is used for the centralized management of tags or scripts used on this Application. The use of these services involves the flow of User Data through them and, where appropriate, their retention.

Google Tag Manager

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data.

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

Productivity Management

This type of service helps the Data Controller to manage tasks, work projects and in general activities related to productivity. When using this type of service, Users' Data will be processed and may be stored, depending on the purposes of the activity in question. These services can be integrated with a wide range of third-party services mentioned in this privacy policy to allow the Owner to import or export the Data necessary for the corresponding activity.

Google Sheets

Google Sheets is an online service for drafting spreadsheets and managing work processes provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data.

Personal Data processed: Data communicated during the use of the service.

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

Category of personal information collected under the CCPA: Internet information.

Management of data collection and online surveys

This type of service allows this Application to manage the creation, implementation, administration, distribution and analysis of forms and online surveys in order to collect, save and reuse the Data of the Users who respond.

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

These services can be integrated with a wide range of third-party services to allow the Data Controller to perform subsequent actions with the Data processed - for example, contact management, sending messages, statistics, advertising and payment processing.

Facebook lead ads

Facebook Lead Ads is an advertising and data collection service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Data Controller manages the processing of Data, which allows Users to be shown advertisements in the form of forms already pre-populated with the Personal Data of their Facebook profiles, such as names and email addresses. Depending on the type of notification, Users may be asked to provide additional information.

Sending the form involves the collection and processing of this Data by the Data Controller pursuant to this privacy policy and only for the specific purpose indicated in the form and / or within this privacy policy, where provided.

The User can exercise his rights at any time, including the right to withdraw consent to the processing of his Data, as specified in the section containing information on the User's rights in this privacy policy.

Personal Data processed: Data communicated during the use of the service.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

Heat mapping and session recording

Heat mapping services are used to identify the areas of this Application with which Users interact most frequently, in order to detect which of them attract the most interest. These services allow you to monitor and analyze traffic data and are used to keep track of User behavior.

Some of these services may record sessions and make them available for later viewing. Hotjar **Heat Maps & Recordings (Hotjar Ltd.)**

Hotjar is a heat mapping and session recording service provided by Hotjar Ltd.

Hotjar respects the generic "Do Not Track" headers. This means that the browser can instruct the script not to collect any User data. This is a setting that is available in all major browsers. More [information about opting out](#) of Hotjar can be found here.

Personal Data processed: Usage data; Tracking Tools; various types of Data as specified in the privacy policy of the service.

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

Category of personal information collected under the CCPA: identifiers; information on the Internet.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Application in order to save and reuse data.

In the event that one of these services is installed, it is possible that, even if Users do not use the service, it collects Usage Data relating to the pages in which it is installed.

Direct marketing via pop-ups (this Application)

This Application uses pop-ups to interact with Users by offering them services or products that can also be offered by third parties and that have no connection with the services provided by this Application.

Personal Data processed: Email; name; various types of Data.

Category of personal information collected under the CCPA: identifiers.

This type of treatment constitutes:

- a sale to the CCPA and VCDPA a share under the CCPA
- targeted advertising according to the VCDPA
-

Advertising

This type of service allows the use of User Data for commercial communication purposes. These communications are shown on this Application in the form of banners and other forms of advertising, also in relation to the User's interests.

This does not mean that all Personal Data is used for this purpose. Data and conditions of use are indicated below.

Some of the services listed below may use Tracking Tools to identify the User or use the behavioral retargeting technique, i.e. display personalized advertisements based on the interests and behavior of the User, also detected outside this Application. For more information on this, we suggest you check the privacy policies of the respective services. Generally, services of this type offer the possibility of disregarding such tracking. In addition to any opt-out functions provided by any of the services listed in this document, you can read more about how to opt out of interest-based advertising in the "How to opt out of interest-based advertising" section in this document.

Google Ad Manager

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data, with which the Data Controller may conduct advertising campaigns together with external advertising networks with which the Data Controller, unless otherwise specified in this document, has no direct relationship.

For an understanding of Google's use of Data, please see [Google's partner policies](#).

This service uses the "DoubleClick" cookie, which tracks the use of this Application and the User's behavior in relation to advertisements, products and services offered.

The User can decide at any time to disable all DoubleClick cookies by going to: [Ads Settings](#).

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA a share under the
- CCPA targeted advertising according to the VCDPA
-

Facebook Lookalike Audiences

Facebook Lookalike Audiences is a behavioral advertising and targeting service provided by Meta Platforms, Inc. or Meta Platforms Ireland Limited, depending on how the Data Controller handles the processing of Data, which uses Data collected through Meta's Custom Audiences service in order to show advertisements to Users with similar behavior to Users who are already on a Custom Audience list based on their previous use of this Application or their interaction with relevant content through Meta's applications and services.

Based on this Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audiences.

Users may opt out of using Meta's Tracking Tools for ad customization by visiting this [opt-out page](#).

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: information on the Internet.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA a share under the
- CCPA targeted advertising according to the VCDPA
-

Google AdSense

Google AdSense is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data. This service uses the "DoubleClick" cookie, which tracks the use of this application and the User's behavior in relation to advertisements, products and services offered.

The User can decide at any time to disable all DoubleClick cookies by going to: [Ads Settings](#).

For an understanding of Google's use of data, please see [Google's partner policies](#).

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA a share under the
- CCPA targeted advertising according to the VCDPA
-

Similar Google Ads audiences

Similar audiences is an advertising and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data, which uses Google Ads Remarketing Data to show advertisements to Users with behaviors similar to those

of other Users who are already on the remarketing list due to their previous use of this Application.

Based on this Data, personalized ads will be shown to Users suggested by similar Google Ads Audiences.

Users who do not want to be included in similar audiences may opt out of and disable their use of the Ad Tracking Tools by visiting: Google [Ads Settings](#).

For an understanding of Google's use of Data, please see [Google's partner policies](#).

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA a share under the
- CCPA • targeted advertising according to the VCDPA

Meta Audience Network

Meta Audience Network is an advertising service provided by Meta Platforms, Inc. or Meta Platforms Ireland Limited, depending on how the Data Controller handles the processing of Data, For an understanding of Meta's **use of data**, please see [Meta's data policy](#).

To enable the operation of the Meta Audience Network, this Application may use certain identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for OS) or technologies similar to cookies. Among the ways in which Audience Network offers advertising messages to the User, there is also the use of the latter's advertising preferences. You can control the view of your advertising preferences within your [Facebook Ad settings](#).

You can opt-out of certain Audience Network targeting features through your device settings. For example, you can change the advertising settings available for mobile devices, or follow the instructions applicable to Audience Network that may be provided within this privacy policy.

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

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

Category of personal information collected under the CCPA: identifier; information on the Internet.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA a share under the
- CCPA targeted advertising according to the VCDPA
-

Collection of privacy preferences

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

Consent Solution by iubenda (iubenda srl)

iubenda's Consent Solution allows you to save and retrieve records of Users' consent to the processing of Personal Data, as well as information and preferences expressed in relation to the consent provided.

A tfor purpose, makes use of a Tracking Tool that temporarily stores pending information on the User's device until it is processed by the API. The Tracking Tool (a browser feature called localStorage) is then deleted.

Personal Data processed: Data communicated during the use of the service; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

Cookie Solution by iubenda (iubenda srl)

iubenda's Cookie Solution allows the Data Controller to collect and save the preferences of Users relating to the processing of personal data and in particular to the use of Cookies and other Tracking Tools on this Application.

Personal Data processed: Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

Remarketing and behavioral targeting

This type of service allows this Application and its partners to communicate, optimize and serve advertisements based on the past use of this Application by the User.

This activity is facilitated by the tracking of Usage Data and the use of Tracking Tools

to collect information that is then transferred to partners who manage remarketing and behavioral targeting activities.

Some services offer a remarketing option based on email address lists.

Services of this type generally offer the possibility of deactivating such tracking. In addition to any opt-out functions provided by any of the services listed in this document, you can read more about how to opt out of interest-based advertising in the "How to opt out of interest-based advertising" section in this document.

Remarketing Google Ads

Remarketing Google Ads is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data, which connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

For an understanding of Google's use of Data, please see [Google's partner policies](#).

Users may opt out of using Google Tracking Tools for ad personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA a share under the
- CCPA targeted advertising according to the VCDPA
-

Remarketing with Google Analytics

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data, which connects the tracking activity carried out by Google Analytics and its Tracking Tools with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA a condisione under
- the CCPA targeted advertising according to the VCDPA
-

Facebook Custom Audiences

Facebook Custom Audiences is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Data Controller manages the processing of Data, which links the activity of this Application with Meta's advertising network.

Users may opt out of using Meta's Tracking Tools for ad personalization by visiting this [opt-out page](#).

Personal Data processed: email; Tracking Tools.

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

Category of personal information collected under the CCPA: identifiers; information on the Internet.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA a sharing under the
- CCPA targeted advertising according to the VCDPA
- **Facebook Remarketing**

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Data Controller manages the processing of Data, which connects the activity of this Application with the Meta advertising network.

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA a share under the
- CCPA targeted advertising according to the VCDPA
-

Statistics

The services contained in this section allow the Data Controller to monitor and analyze traffic data and are used to keep track of User behavior.

Google Analytics

Google Analytics is a web analytics service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of Data, ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Application, compiling and sharing them with other services developed by Google.

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

Personal Data processed: Usage data; Tracking tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes: • a sale under the CCPA

and VCDPA

Google Analytics with anonymized IP

Google Analytics is a web analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data, ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Application, compiling reports and sharing them with other services developed by Google.

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

This Google Analytics integration anonymizes your IP address. The anonymization works by shortening the IP address of Users within the borders of the member states of the European Union or in other countries adhering to the Agreement on the European Economic Area. Only in exceptional cases will the IP address be sent to Google's servers and shortened within the United States.

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

Meta Events Manager

Meta Events Manager is a statistics service provided by Meta Platforms Ireland Limited or Meta Platforms, Inc., depending on how the Data Controller manages the processing of Data. By integrating the Meta pixel, Meta Events Manager may provide the Owner with information about traffic and interactions on this Application.

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale to the CCPA and VCDPA members

Google Analytics 4

Google Analytics is a statistical service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data, ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Application, compiling reports and sharing them with other services developed by Google.

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

In Google Analytics 4, IP addresses are used at the time of collection and then deleted before the data is recorded in any data center or server. To learn more, you can consult the [official documentation of Google](#).

Personal Data processed: session statistics; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

Facebook Ads conversion tracking (Facebook pixel)

Facebook Ads conversion tracking (Meta pixel) is a statistics service provided by Meta Platforms, Inc. or Meta Platforms Ireland Limited, depending on how the Data Controller manages the processing of Data, which links data from the Meta ad network with the actions performed within this Application. The Meta pixel tracks conversions that can be attributed to Facebook, Instagram and Audience Network ads.

Personal data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

Performance testing of content and functionality (A/B testing)

The services contained in this section allow the Data Controller to track and analyze the response by the User, in terms of traffic or behavior, in relation to changes in the structure, text or any other component of this Application.

Google Optimize 360

Google Optimize 360 is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data, ("Google").

This service allows the Owner to target groups of Users on the basis of their past use of this Application. Users who [disable](#) tracking by Google Analytics will not be included in experiments created within Google Optimize 360.

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

Personal Data transmitted: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

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 you.

This type of service could still collect data on web traffic related to the pages where the service is installed, even when users do not use it.

Google Fonts

Google Fonts is a font style display service managed by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages the processing of Data, which allows this Application to integrate such content within its pages.

Personal Data processed: Usage data; Tracking Tools.

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

Category of personal information collected under the CCPA: Internet information.

This type of treatment constitutes:

- a sale under the CCPA and VCDPA

Learn how to opt out of interest-based advertising

In addition to any opt-out function provided by any of the services listed in this document, Users can read more about how to opt out of interest-based advertising in the appropriate section of the Cookie Policy.

Further information on the processing of Personal Data

Sale of goods and services online

The Personal Data collected are used for the provision of services to the User or for the sale of products, including payment and possible delivery. The Personal Data collected to complete the payment may be those relating to the credit card, the current account used for the transfer or other payment instruments for the transfer. The Payment Data collected by this Application depends on the payment system used.

Automated decision-making

When a decision that may produce legal effects for the User or may have a similarly significant impact on his person is taken exclusively with technological tools and without human intervention, there is an automated decision-making process. Within the scope of the purposes described in this document, this Application may use the User's Personal Data to make decisions based completely or partially on automated processes. This Application uses automated processes to the extent that it is necessary to conclude or execute a contract between the User and the Owner or, if required by law, subject to the consent given by the User. Automated decisions depend on technological tools provided by the Data Controller or third parties and are generally based on algorithms that meet predefined criteria. The logic behind automated decision-making processes aims to:

- enable or improve decision-making; guarantee Users fair and
- impartial treatment;
- reduce potential harm resulting from human error, bias or other similar circumstances that could lead to discrimination or imbalances in the treatment of individuals; reduce the risk of non-performance of the obligations of a contract by the User.
-

To obtain further information on the purposes, any third-party services and on the specific logic of the automated decision-making processes adopted by this Application, the User can refer to the respective sections of this document.

Effects of automated decision-making processes and rights of Users subject to them

Users subject to this type of processing may exercise specific rights aimed at preventing or limiting the potential effects of automated decision-making processes. In particular, Users have the right to:

- receive an explanation of any decision taken as a result of an automated decision-making process and express an opinion in this regard;
- challenge the decision by asking the Data Controller to reconsider it or adopt a new decision on a different basis; request and obtain from the Data Controller a human intervention in the processing.
-

To obtain further information on the rights of Users and their exercise, the User can refer to the section of this document relating to the rights of Users.

Equivalent level of protection of User Data

This Application shares User Data only with selected third parties as they guarantee a level of protection of User Data equal or equivalent to that described in this privacy policy and required by the legislation on the protection of personal data. The privacy policies of these third parties contain further information on the respective processing of personal data and their respective privacy policies.

Your rights

Users may exercise certain rights with reference to the Data processed by the Data Controller.

In particular, the User has the right to:

- **withdraw consent at any time.** The User may revoke the consent to the processing of their Personal Data previously expressed.
- **oppose the processing of their data.** The User may object to the processing of their Data when it takes place on a legal basis other than consent. Further details on the right to object can be found in the section below.
- **access your Data.** The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the Data processed.
- **verify and request rectification.** The User can verify the correctness of their Data and request its updating or correction.
- **obtain the limitation of the treatment.** When certain conditions are met, the User may request the restriction of the processing of their Data. In this case, the Data Controller will not process the Data for any other purpose than their conservation.
- **obtain the cancellation or removal of their Personal Data.** When certain conditions are met, the User may request the deletion of their Data by the Owner.
- **receive their Data or have them transferred to another holder.** The User has the right to receive their Data in a structured format, commonly used and readable by automatic device and, where technically feasible, to obtain its transfer without obstacles to another holder. This provision is applicable when the Data are processed with automated tools and the processing is based on the User's consent, on a contract of which the User is a party or on contractual measures connected to it.
- **lodge a complaint.** The User may lodge a complaint with the competent personal data protection supervisory authority or take legal action.

Details on the right to object

When Personal Data are processed in the public interest, in the exercise of public authority vested in the Data Controller or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons related to their particular situation.

Users are reminded that, if their Data were processed for direct marketing purposes, they can oppose the processing without providing any reason. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

How to exercise your rights

To exercise the rights of the User, Users can address a request to the contact details of the Titles indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within one month.

Cookie Policy

This Application makes use of Tracking Tools. To learn more, the User can consult the [Cookie Policy](#).

Further information on the treatment

Defence in court

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its possible establishment for the defense against abuse in the use of this Application or related Services by the User.

The User declares to be aware that the Data Controller may be obliged to disclose the Data by order of the public authorities.

Specific information

At the request of the User, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

System logs and maintenance

For needs related to operation and maintenance, this Application and any third party services used by it may collect system logs, which are files that record the interactions and that may also contain Personal Data, such as the User IP address.

Information not contained in this policy

Further information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact details.

Responding to "Do Not Track" requests

This Application does not support "Do Not Track" requests.

To find out if any third-party services used support them, the User is invited to consult their respective privacy policy.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if possible, on this Application and, if technically and legally feasible, by sending a notification to Users through one of the contact details in its possession. Please therefore consult this page frequently, referring to the date of last modification indicated at the bottom.

If the changes concern treatments whose legal basis is consent, the Data Controller will collect the User's consent again, if necessary.

Information for Californian consumers

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

The provisions contained in this section apply to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the state of 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, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term "personal information" as defined in the California Consumer Privacy Act (CCPA/CPRA).

Notice at collection

Categories of personal information collected, used, sold, or shared

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. **You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.**

Information we collect: the categories of personal information we collect

We have collected the following categories of personal information about you: identifiers and internet information.

We do not collect sensitive personal information.

We will not collect additional categories of personal information without notifying you.

What are the purposes for which we use your personal information?

We may use your personal information to allow the operational functioning of this Application and features thereof ("business purposes"). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section "Detailed information on the processing of Personal Data" within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

How long do we keep your personal information?

Unless otherwise stated inside the "Detailed information on the processing of Personal Data" section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

How we collect information: what are the sources of the personal information we collect?

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

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

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

How we use the information we collect: disclosing of your personal information with third parties for a business purpose

For our purposes, the word "third party" means a person who is not any of the following: a service provider or a contractor, as defined by the CCPA.

We disclose your personal information with the third parties **listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

Sale or sharing of your personal information

For our purposes, the word "sale" means any "selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer's personal information by the business to a **third party, for monetary or other valuable consideration**", as defined by the CCPA.

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

For our purposes, the word "sharing" means any "sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged", as defined by the CCPA.

Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CCPA, does not constitute a sale or sharing of your personal information.

Your right to opt out of the sale or sharing of your personal information and how you can exercise it

We sell or share your personal information with the third parties **listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

You have the right to opt out of the sale or sharing of your personal information. This means that whenever you request us to stop selling or sharing your personal information, we will abide by your request.

Such requests can be made freely, at any time, without submitting any verifiable request.

To fully exercise your right to opt out, you can contact us at any time using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Application.

If you want to submit requests to opt out of the sale or sharing of personal information via a user-enabled global privacy control, like the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a [participating](#) browser or browser extension. More information about downloading GPC is available [here](#).

We use any personal information collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

What are the purposes for which we use your personal information?

We may use your personal information to allow the operational functioning of this Application and features thereof ("business purposes"). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section "Detailed information on the processing of Personal Data" within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

How long do we keep your personal information?

Unless otherwise stated inside the "Detailed information on the processing of Personal Data" section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

Your privacy rights under the California Consumer Privacy Act and how to exercise them

The right to access personal information: the right to know and to portability

You have the right to request that we disclose to you:

- the categories of personal information that we collect about you; the sources from
- which the personal information is collected;
- the purposes for which we use your information; to whom we disclose such information;
- the specific pieces of personal information we have collected about you.
-

You also have **the right to know what personal information is sold or shared and to whom**. In particular, you have the right to request two separate lists from us where we disclose:

- the categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared; the categories of personal information that we disclosed about you for a business
- purpose and the categories of persons to whom it was disclosed for a business purpose.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance – provided that this is technically feasible.

The right to request the deletion of your personal information

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on this Application, to detect security incidents and protect against fraudulent or illegal activities, to exercise and certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and notify any of our service providers and all third parties to whom we have sold or shared the personal information to do so – provided that this is technically feasible and doesn't involve disproportionate effort. **The right to correct inaccurate personal information**

You have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

The right to opt out of sale or sharing of personal information and to limit the use of your sensitive personal information

You have the right to opt out of the sale or sharing of your personal information. You also have the right to request that we limit our use or disclosure of your sensitive personal information.

The right of no retaliation following opt-out or exercise of other rights (the right to nondiscrimination)

We will not discriminate against you for exercising your rights under the CCPA. This means that we will not discriminate against you, including, but not limited to, by denying goods or services, charging you a different price, or providing a different level or quality of goods or services just because you exercised your consumer privacy rights.

However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction.

To the extent permitted by the law, we may offer you promotions, discounts, and other deals in exchange for collecting, keeping, or selling your personal information, provided that the financial incentive offered is reasonably related to the value of your personal information.

How to exercise your rights

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

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will use any personal information collected from you in connection with the verification of your request solely for the purposes of verification and shall not further disclose the personal information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

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

You can submit a maximum number of 2 requests over a period of 12 months.

How and when we are expected to handle your request

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period. Only with regard to personal information collected on or after January 1, 2022, you have the right to request that we disclose information beyond the 12-month period, and we will provide them to you unless doing so proves impossible or would involve a disproportionate effort.

Should we deny your request, we will explain you the reasons behind our denial.

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

Information for Virginia consumers

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

The provisions contained in this section apply to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the Commonwealth of Virginia, according to the "[Virginia Consumer Data Protection Act](#)" (the "VCDPA"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term "personal data" as defined in the VCDPA.

Categories of personal data processed

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.**

Categories of personal data we collect

We have collected the following categories of personal data: identifiers and internet information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

Why we process your personal data

To find out why we process your personal data, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

How we use the data we collect: sharing of your personal data with third parties

We share your personal data with the third parties **listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a natural or legal person, public authority, agency, or body other than the consumer, controller, processor, or an affiliate of the processor or the controller" as defined by the VCDPA.

Saland of your personal data

For our purposes, the word "sale" means any "exchange of personal data for monetary consideration by us to a third party" as defined by the VCDPA.

Please note that according to the VCDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale.

As specified in the "Detailed information on the processing of Personal Data" section of this document, our use of your personal information may be considered a sale under VCDPA.

Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

Processing of your personal data for targeted advertising

For our purposes, the word "targeted advertising" means "displaying advertisements to you where the advertisement is selected based on personal data obtained from your activities over time and across nonaffiliated websites or online applications to predict your preferences or interests" as defined by the VCDPA.

To find out more details on the processing of your personal data for targeted advertising purposes, you can read the section titled "Detailed information on the processing of Personal Data" within this document.

Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Your privacy rights under the Virginia Consumer Data Protection Act and how to exercise them

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

- **access personal data: the right to know.** You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data. **correct inaccurate personal data.** You have the right to
- request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- **request the deletion of your personal data.** You have the right to request that we delete any of your personal data. **obtain a copy of your personal data.** We will provide your personal data in a portable and usable format that allows you to transfer
- data easily to another entity – provided that this is technically feasible.

• **opt out of the processing of your personal data for the purposes of targeted advertising**, the **sale of personal data**, or **profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you. • **non-discrimination.** We will not discriminate against you for exercising your rights under the VCDPA. This means that we will not, among other things, deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your consumer privacy rights. However, if you refuse to provide your personal data to us or ask us to delete or stop selling your personal data, and that personal data or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction. To the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if you have exercised your right to opt out, or our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

How to exercise your rights

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

For us to respond to your request, we need to know who you are.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relates to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

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

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 60 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to two requests per year. If your request is manifestly unfounded, excessive or repetitive, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

Information for users resident in Brazil

This part of this document supplements and supplements the information contained in the rest of the privacy policy and is provided by the entity operating this Application and, where applicable, its parent company and its subsidiaries and affiliates (for the purposes of this section collectively referred to as "we", "our" or "our"). The provisions contained in this section apply to all Users who are residents of Brazil, pursuant to "Lei Geral de Proteção de Dados" (such Users are hereinafter referred to simply as "you", "your", "you" or "your"). For these Users, these provisions prevail over any other provision that may diverge or conflict contained in this privacy policy.

In this part of the document the term "personal information" as defined by the Lei Geral de Proteção de Dados (**LGPD**) is used.

Legal bases on which we process your personal information

We only process your personal information where one of the legal bases for such processing exists. The legal bases are as follows:

- your consent to the processing activities in question;
- compliance with legal obligations that we are required to satisfy;
- the execution of rules dictated by laws or regulations or by contracts, agreements or other similar legal instruments; studies conducted by research institutions, preferably carried out on anonymised personal information; the performance of a contract and related pre-contractual obligations, if you are a party to that contract; the exercise of our rights in court,
- administrative proceedings or arbitration; the defense or physical integrity of you or a third party;
- health protection - in the context of procedures put in place by entities or professionals in the health sector;
- our legitimate interest, provided that your fundamental rights and freedoms do not override those interests; and credit protection.

To learn more about the legal bases, you can contact us at any time using the contact details provided in this document.

Categories of personal information processed

To find out what categories of personal information are processed, you can refer to the section "Dictates on the processing of Personal Data" in this document.

Why we process your personal information

To learn why we process your personal information, please refer to the "Details of the Processing of Personal Data" and "Purpose of Processing of Collected Data" sections in this document.

Your privacy rights in Brazil, how to make a request and how it will be handled by us

Your privacy rights in Brazil

You have the right to:

- obtain and confirm the existence of processing activities concerning your personal information; access your personal information;
 - obtain the rectification of your incomplete, inaccurate or outdated personal information; obtain the anonymization, blocking or deletion of unnecessary or excessive personal information, or of information that is processed contrary to the provisions of the LGPD; obtain information about the possibility of giving or refusing your consent and its consequences;
 - obtain information about the third parties with whom we share your personal information; obtain, upon your explicit request, the portability of your personal information (with the exception of anonymized information) to other suppliers of products or services, provided that our trade and trade secrets are safeguarded;
 - obtain the deletion of personal information processed if the processing has been carried out on the basis of your consent, unless one or more of the exceptions provided for in the article is applicable
- 16 LGPD;
- withdraw your consent at any time;
 - lodge a complaint regarding your personal information with the ANPD (National Data Protection Authority) or a consumer protection body;
 - object to processing activities in cases where such processing is not carried out in accordance with the provisions of the law; require clear and adequate information about the criteria and procedures used in automated decision-making; and request review of decisions that harm your interests, made solely on the basis of automated decision-making processes of your personal information. These include decisions to outline your personal, professional, consumer or creditor profile, or other aspects of your personality.

You will never be discriminated against, nor will you suffer in any way any treatment that is unfavorable to you, as a result of the exercise of your rights.

How to submit a request

You can make an explicit request to exercise your rights free of charge, at any time, using the contact details in this document or through your legal representative.

How and how long we will handle your request

We will do our best to respond to your request as soon as possible.

In any case, if it is impossible for us to do so, we will make sure to inform you of the factual or legal reasons that prevent us from immediately complying or following up on your request. If your personal information is not processed by us, if we are able to do so, we will indicate the natural or legal person to whom to address your requests.

In the event that you decide to submit an **access** request or a request for **confirmation of the existence of the processing of** personal information, please ensure that you specify whether you prefer to receive your personal information in electronic or paper format. You will also need to let us know if you would like an immediate response, in which case you will receive a simplified answer, or if you require a full report.

In the latter case, we will respond within 15 days from the time of your request, providing you with all the information regarding the origin of your personal information, confirmation or not of the existence of personal information concerning you, all the criteria used for the processing and the purposes of such processing, while safeguarding our trade and industrial secrets.

In the event that you decide to make a request for **rectification, deletion, anonymization or blocking** of personal information, we will ensure to immediately inform the other parties with whom we have shared your personal information of your request so that they can also comply with your request - except in cases where such disclosure is impossible or excessively burdensome for us.

Transfer of personal information outside the B rasile where permitted by law

We may transfer your personal information outside of Brazil in the following cases:

- where the transfer is necessary for international legal cooperation between intelligence services, investigative and criminal procedure bodies, as provided for in the instruments made available under international law;

- when the transfer is necessary to defend your life or limb or that of a third party; where the transfer is authorized by the ANPD; where the transfer results from an obligation entered into under an international cooperation agreement;
 - when the transfer is necessary for the exercise of public order or for the performance of a public service; when the transfer is necessary for the fulfillment of a legal obligation, the execution of a contract and the related pre-contractual obligations, or
 - the normal exercise of rights in the judiciary, administrative or arbitration proceedings.
- **Definitions and legal references**

Personal Data (or Data)

Personal data is any information that, directly or indirectly, also in connection with any other information, including a personal identification number, identifies or identifies 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 the 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 obtained in response, the numerical code indicating the status of the request from the server (successful, error, etc.), the country of origin, the characteristics of the browser and the operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details of the path followed within the Application, with particular reference to the sequence of pages consulted, to the parameters relating to the operating system and the User's IT environment.

User

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

Interested

The natural person to whom the Personal Data refers.

Data Processor (or Manager)

The natural person, legal person, public administration or any other body that processes personal data on behalf of the Data Controller, as set out in this privacy policy.

Data Controller (or Data Controller)

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 security measures relating to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application. **This Application**

The hardware or software tool through which the Personal Data of Users are 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, any reference to the European Union in this document shall be deemed to extend to all current member states of the European Union and the European Economic Area.

Cookie

Cookies are Tracking Tools that consist of small portions of data stored within the User's browser.

Strumento Tracking

Tracking Tool means any technology - eg. Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - which allows Users to be tracked, for example by collecting or saving information on the User's device. **Email**

Provides access to the User's primary email address.

Legal references

This privacy statement has been prepared on the basis of multiple legislative systems, including Articles. 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement applies exclusively to this Application.

Lastupdate: February 20, 2023