

# Privacy Policy of Monarch Coaching & Training, LLC

This Application collects some Personal Data from its Users.

Users may be subject to different protection standards and broader standards may therefore apply to some. To learn more about the protection criteria, Users can refer to the applicability section.

This document contains [a section dedicated to Californian consumers and their privacy rights](#).

This document contains [a section dedicated to Brazilian Users and their privacy rights](#).

This document can be printed for reference by using the print command in the settings of any browser.

## Owner and Data Controller

**Monarch Coaching & Training, LLC**

5233 W Canal Blvd

Tracy, CA 95304

**Owner contact email:** [karen@monarchcoachingllc.com](mailto:karen@monarchcoachingllc.com)

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Tracker; Usage Data; Universally unique identifier (UUID); email address; Email; phone number; Data communicated while using the service; first name; username; last name; email; phone

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

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

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

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

Users are responsible for any third-party Personal Data obtained, published, or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

## **Mode and place of processing the Data**

### **Methods of processing**

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

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### **Legal basis of processing**

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

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;

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

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

## Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

If broader protection standards are applicable, Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

## Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.

- Personal Data collected for the purposes of the Owner’s legitimate interests shall be retained if needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

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

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

## **The purposes of processing**

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Handling payments, Advertising, Displaying content from external platforms, Managing contacts and sending messages, Hosting and backend infrastructure, Backup saving and management, User database management, Traffic optimization and distribution, Tag Management, SPAM protection, Social features, Registration and authentication provided directly by this Application, Registration and authentication, Location-based interactions, Interaction with live chat platforms, Communication, Interaction with external social networks and platforms, Infrastructure monitoring, Heat mapping and session recording, Handling productivity related activity , Data transfer outside the EU, Content performance and features testing (A/B testing), Content commenting, Contacting the User, Connecting Data, Analytics and Information collection.

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

## **Detailed information on the processing of Personal Data**

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

- **Advertising**

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

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

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.

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

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Analytics**

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

- **Google Analytics**

Google Analytics is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on the location this Application is accessed from, ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

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

Personal Data processed: Tracker; Usage Data.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding

how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Backup saving and management**

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

- **Backup on Dropbox (Dropbox, Inc.)**

- Dropbox is a service to save and manage backups provided by Dropbox Inc.

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

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

- Category of personal information collected according to CCPA: internet information.

- **Backup on Google Drive**

- Google Drive is a service to save and manage backups provided by Google LLC or by Google Ireland Limited, depending on the location this Application is accessed from.

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

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

- Category of personal information collected according to CCPA: internet information.

- **Communication**

- **GoDaddy Chat Widget**

- We provide live user interaction with our staff using GoDaddy widget and app.

- **Contacting the User**

- **Contact form (this Application)**

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

Personal Data processed: address; city; company name; country; county; email address; first name; last name; phone number; various types of Data; website; ZIP/Postal code.

Category of personal information collected according to CCPA: identifiers; commercial information; internet information.

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

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

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

Category of personal information collected according to CCPA: identifiers; internet information.

- **Content commenting**

Our application does not permit content commenting.

- **Data transfer outside the EU**

The Owner is allowed to transfer Personal Data collected within the EU to third countries (i.e. any country not part of the EU) only pursuant to a specific legal basis. Any such Data transfer is based on one of the legal bases described below.

Users can inquire with the Owner to learn which legal basis applies to which specific service.

### **Other legal basis for Data transfer abroad (this Application)**

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;

- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defense of legal claims;
- the transfer is necessary to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent. In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Application.

Personal Data processed: various types of Data.

Category of personal information collected according to CCPA: internet information.

### **Data transfer abroad based on consent (this Application)**

If this is the legal basis, Personal Data of Users shall be transferred from the EU to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.

In such cases, the Owner shall inform Users appropriately and collect their explicit consent via this Application.

Personal Data processed: various types of Data.

Category of personal information collected according to CCPA: internet information.

### **YouTube video widget**

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on the location this Application is accessed from, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding

how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Handling payments**

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

- **PayPal (PayPal Inc.)**

- PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

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

- Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

- Category of personal information collected according to CCPA: internet information.

- **Handling productivity related activity**

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

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

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

- **Hosting and backend infrastructure**

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

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

- **Information collection**

- **Scrum Alliance**

- We collect your data in accordance with this privacy policy and share it with Scrum Alliance if you buy a class, certification, or a service from us that is licensed to us by Scrum Alliance.

- By purchasing any product from us for the purpose of the certification with Scrum Alliance, and by agreeing to the terms and conditions and privacy policies of those products upon your checkout, you agree to the following.

- You agree that you are enrolled in the course under the license from Scrum Alliance and you are seeking Scrum certification. You acknowledge that Monarch Agile Solutions must send my name and email address to Scrum Alliance, Inc. in order for you to be considered for Scrum certification and for your certification, if earned, to be awarded. You also acknowledge that Monarch Agile Solutions must send your name and contact information to Scrum Alliance, Inc. to allow Scrum Alliance, Inc. to monitor attendance at courses, and that Scrum Alliance, Inc. has a legitimate business reason for obtaining and using this information.

- You understand that Scrum Alliance, Inc. is based in the United States and you have been informed that the European Commission has not determined that the United States ensures an adequate level of protection for personal data. We provide you with the Scrum Alliance, Inc. Privacy Policy located at <https://www.scrumalliance.org/privacy-policy>. You understand that it covers Scrum Alliance, Inc.'s processing of your Personal Data. You consent to the transfer, storage, and processing of your name and e-mail address to and in the United States. You understand that your consent can be withdrawn at any time, but realize that Scrum Alliance, Inc. must have your Personal Data for you to maintain your certification.

- **Monarch Agile Solutions**

- If you buy any product from us that is eligible for ICAgile Agile Certified Coach, ICAgile for Human Resources, your information, including name, location, and any certification you earned with us will be posted on the Monarch Agile Solutions website in your user purchase information section.

- **Infrastructure monitoring**

This type of service allows this Application to monitor the use and behavior of its components so its performance, operation, maintenance, and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of this Application.

- **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

The interaction and information obtained through this Application are always subject to the User's privacy settings for each social network.

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

It is recommended to log out from the respective services in order to make sure that the processed data on this Application isn't being connected back to the User's profile.

### **Facebook Like button and social widgets**

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on the location this Application is accessed from,

Personal Data processed: Tracker; Usage Data.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

### **LinkedIn button and social widgets (LinkedIn Corporation)**

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Tracker; Usage Data.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

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

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

Personal Data processed: Tracker; Usage Data.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

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

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

Personal Data processed: Tracker; Usage Data.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

### **YouTube button and social widgets**

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google LLC or by Google Ireland Limited, depending on the location this Application is accessed from.

Personal Data processed: Usage Data.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Interaction with live chat platforms**

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

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

- **GoDaddy Chat Widget**

The GoDaddy Chat Widget is a service for interacting with the GoDaddy live chat platform provided by GoDaddy

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

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

Category of personal information collected according to CCPA: identifiers; internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User. These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

## **Mailchimp (The Rocket Science Group LLC)**

Mailchimp is an email address management and message sending service provided by The Rocket Science Group LLC.

Personal Data processed: various types of Data.

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

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Registration and authentication**

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

- **Registration and authentication provided directly by this Application**

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

### **Direct registration (this Application)**

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data processed: address; billing address; city; company name; country; county; email address; first name; house number; last name; password; phone number; picture; profession; profile picture; state; Twitter handle; Usage Data; User

ID; username; various types of Data; VAT Number; website; workplace; ZIP/Postal code.

Category of personal information collected according to CCPA: identifiers; commercial information; internet information; sensorial information; employment related information.

- **Social features**

- **Public profile (this Application)**

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

- Personal Data processed: address; city; company name; country; email address; first name; last name; phone number; picture; profession; state; username.

- Category of personal information collected according to CCPA: identifiers; commercial information; sensorial information; employment related information.

- **SPAM protection**

- This type of service analyzes the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

- **Google reCAPTCHA**

- Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on the location this Application is accessed from. The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).  
Personal Data processed: Tracker; Usage Data.

- Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).  
Category of personal information collected according to CCPA: internet information.

- **User database management**

- This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Application, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the

Owner can display and use for improving this Application.  
Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Application.

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

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

- **The Service is intended for adults**

Users declare themselves to be adult according to their applicable legislation.  
Minors may not use this Application.

- **The Service is not directed to children under the age of 13**

Users declare themselves to be adult according to their applicable legislation.  
Minors may use this Application only with the assistance of a parent or guardian.  
Under no circumstance persons under the age of 13 may use this Application.

- **Unique device identification**

This Application may track Users by storing a unique identifier of their device, for analytics purposes or for storing Users' preferences.

- **User identification via a universally unique identifier (UUID)**

This Application may track Users by storing a so-called universally unique identifier (or short UUID) for analytics purposes or for storing Users' preferences. This identifier is generated upon installation of this Application, it persists between Application launches and updates, but it is lost when the User deletes the Application. A reinstall generates a new UUID.

## **The rights of Users**

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

Users entitled to broader protection standards may exercise any of the rights described below. In all other cases, Users may inquire with the Owner to find out which rights apply to them.

Users have the right to do the following:

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

## Details about the right to object to processing

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

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

## How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

## **Applicability of broader protection standards**

While most provisions of this document concern all Users, some provisions expressly only apply if the processing of Personal Data is subject to broader protection standards.

Such broader protection standards apply when the processing:

- is performed by an Owner based within the EU;
- concerns the Personal Data of Users who are in the EU and is related to the offering of paid or unpaid goods or services, to such Users;
- concerns the Personal Data of Users who are in the EU and allows the Owner to monitor such Users' behavior taking place in the EU.

## **Cookie Policy**

This Application uses Trackers. To learn more, the User may consult the

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

### **Legal action**

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

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

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

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

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

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

### **How “Do Not Track” requests are handled**

This Application does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

## **Changes to this privacy policy**

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

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

## **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 who are consumers residing in the state of California, United States of America, according to "The California Consumer Privacy Act of 2018" (Users are referred to below, simply as “you”, “your”, “yours”), 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 information” as it is defined in The California Consumer Privacy Act (CCPA).

## **Categories of personal information collected, disclosed, or sold**

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

### **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: sharing and disclosing of your personal information with third parties for a business purpose**

We will not disclose the personal information we collect about you to a third party for any purpose.

### **Sale of your personal information**

We will not sell your personal information under any circumstances.

### **Your right to opt out of the sale of personal information**

You have the right to opt out of the sale of your personal information. This means that whenever you request us to stop selling your data, we will abide by your request. Such requests can be made freely, at any time, without submitting any verifiable request, simply by following the instructions below.

## **Your California privacy rights and how to exercise them**

### **The right to know and to portability**

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

- the categories and sources of the personal information that we collect about you, the purposes for which we use your information and with whom such information is shared;
- in case of sale of personal information or disclosure for a business purpose, two separate lists where we disclose:
  - for sales, the personal information categories purchased by each category of recipient; and
  - for disclosures for a business purpose, the personal information categories obtained by each category of recipient.

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 certain rights etc.).

If no legal exception applies, because of exercising your right, we will delete your personal information and direct any of our service providers to do so.

## **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 relates to you.

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 30 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 60 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period.

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.

## How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

## How and when we will respond to your request

We will strive to promptly respond to your requests. In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests if we are in the position to do so.

If you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead. In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

If you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request – except in cases where such communication is proven impossible or involves disproportionate effort on our side.

## Definitions and legal references

## **Cookie**

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

## **Data Subject**

The natural person to whom the Personal Data refers.

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

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

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

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

## **Email**

Provides access to the User's primary email address.

## **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.

## **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.

## **Service**

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

## **This Application**

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

## **Tracker**

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

## **Usage Data**

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

## **User**

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

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## **Legal information**

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

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

Latest update: January 14, 2022