# Privacy Policy of Therapute

This Application collects some Personal Data from its Users.

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

# **Policy Summary**

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

- Access to third-party accounts
  - Facebook account access

Permissions: About Me; Tracker

- Analytics
  - Google Analytics

Personal Data: Tracker; Usage Data

- Beta Testing
  - App Center

Personal Data: Data communicated while using the service; email address; various types of Data as specified in the privacy policy of the service

■ TestFlight

Personal Data: app information; Tracker

- Contacting the User
  - Contact form

Personal Data: city; date of birth; email address; first name; gender; state

Mailing list or newsletter

Personal Data: Tracker

- Data transfer outside of the UK
  - Data transfer abroad based on consent (UK) and Other legal basis for Data transfer abroad (UK)

Personal Data: various types of Data

- Device permissions for Personal Data access
  - Device permissions for Personal Data access

Personal Data: Approximate location permission (continuous); Bluetooth sharing permission; Calendar permission; Contacts permission; Google Assistant permission; Google Home permission; Health Data read permission; Health Data update permission ; Phone permission; Siri permission; Storage permission

- Handling payments
  - Braintree

Personal Data: Tracker

# ■ Stripe

Personal Data: Tracker; Usage Data

- Interaction with external social networks and platforms
  - LinkedIn button and social widgets

Personal Data: Tracker; Usage Data

- Platform services and hosting
  - WordPress.com

Personal Data: device information; Tracker; various types of Data as specified in the privacy policy of the service

- Registration and authentication provided directly by this Application
  - Direct registration

Personal Data: Tracker

- User database management
  - HubSpot CRM

Personal Data: email address; phone number; various types of Data as specified in the privacy policy of the service

ZOHO CRM

Personal Data: Tracker

# **Contact information**

Owner and Data Controller

Therapute, inc

376 Main St, Suite 300, Bedminster NJ 07921 Owner contact email: info@therapute.co

# Full policy

#### Owner and Data Controller

Therapute, inc

376 Main St, Suite 300, Bedminster NJ 07921

Owner contact email: info@therapute.co

# **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; first name; gender; date of birth; state; email address; city; Data communicated while using the service; app information; various types of Data; phone number; Calendar permission; Contacts permission; Approximate location permission (continuous); Phone permission; Storage permission; Bluetooth sharing permission; Health Data read permission; Health Data update permission; Siri permission; Google Assistant permission; Google Home permission; device information.

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 in particular 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.

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 as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to 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: Interaction with external social networks and platforms, Contacting the User, Access to third-party accounts, Analytics, Beta Testing, Data transfer outside of the UK, Handling payments, User database management, Device permissions for Personal Data access, Registration and authentication provided directly by this Application and Platform services and hosting.

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

# Facebook permissions asked by this Application

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

For more information about the following permissions, refer to the Facebook permissions documentation and to the Facebook privacy policy.

The permissions asked are the following:

#### **Basic information**

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

#### **About Me**

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

#### **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.

# **Device permissions for Personal Data access**

Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.

The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of this Application. If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by this Application.

#### **Approximate location permission (continuous)**

Used for accessing the User's approximate device location. This Application may collect, use, and share User location Data in order to provide location-based services.

#### Bluetooth sharing permission

Used for accessing Bluetooth related functions such as scanning for devices, connecting with devices, and allowing data transfer between devices.

#### Calendar permission

Used for accessing the calendar on the User's device, including the reading, adding and removing of entries.

#### **Contacts permission**

Used for accessing contacts and profiles on the User's device, including the changing of entries.

#### **Google Assistant permission**

Used for sending the User's Data to Google Assistant (an artificial intelligence-powered virtual assistant).

#### **Google Home permission**

Used for accessing the Google Home and Chromecast devices and enabling this Application to interact with physical accessories in the User's surrounding environment.

#### **Health Data read permission**

Allows reading the User's health Data.

# **Health Data update permission**

Allows the updating of the User's health Data.

# Phone permission

Used for accessing a host of typical features associated with telephony. This enables, for instance, read-only access to the "phone state", which means it enables access to the phone number of the device, current mobile network information, or the status of any ongoing calls.

#### Siri permission

Used for sending the User's Data to Siri (an artificial intelligence-powered virtual assistant).

# Storage permission

Used for accessing shared external storage, including the reading and adding of any items.

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

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

# Access to third-party accounts

This type of service allows this Application to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

# Facebook account access (Facebook, Inc.)

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

Permissions asked: About Me; Tracker.

Place of processing: United States - Privacy Policy.

# Analytics

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

# Google Analytics (Google LLC)

Google Analytics is a web analysis service provided by Google LLC ("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.

# Beta Testing

This type of service makes it possible to manage User access to this Application, or parts of it, for

the purpose of testing a certain feature or the entire Application.

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

# **App Center (Microsoft Corporation)**

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

Personal Data processed: Data communicated while using the service; email address; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy.

# TestFlight (Apple Inc.)

TestFlight is a beta testing service provided by Apple Inc.

Personal Data processed: app information; Tracker.

Place of processing: United States – Privacy Policy.

# • 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: city; date of birth; email address; first name; gender; state.

# 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: Tracker.

# • Data transfer outside of the UK

The Owner is allowed to transfer Personal Data collected within the UK to third countries only subject to specific legal requirements (so-called "restricted transfers"). Restricted transfers may take place according to the conditions specified below.

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

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

If this is the legal basis, Personal Data of Users shall be transferred from the UK 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.

Other legal basis for Data transfer abroad (UK) (this Application)

If no other legal basis applies, Personal Data shall be transferred from the UK 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 defence of legal claims;
- the transfer is necessary in order 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;
- the data transferred is sourced from a public register created under UK law;
- subject to further conditions, the Owner has a compelling legitimate interest to perform a one-off transfer of Personal Data.
- 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.

#### • Device permissions for Personal Data access

This Application requests certain permissions from Users that allow it to access the User's device Data as described below.

#### **Device permissions for Personal Data access (this Application)**

This Application requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Approximate location permission (continuous); Bluetooth sharing permission; Calendar permission; Contacts permission; Google Assistant permission; Google Home permission; Health Data read permission; Health Data update permission; Phone permission; Siri permission; Storage permission.

# 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.

#### Braintree (PayPal Inc.)

Braintree is a payment service provided by Braintree, a division of PayPal Inc.

Personal Data processed: Tracker.

Place of processing: See the Braintree privacy policy – Privacy Policy.

#### Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States - Privacy Policy.

# • Interaction with external social networks and platforms

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

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

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

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

# LinkedIn button and social widgets (LinkedIn Corporation)

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

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

#### Platform services and hosting

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

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

#### WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to build, run and host this Application.

Personal Data processed: device information; Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

# 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: Tracker.

# 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.

# **HubSpot CRM (HubSpot, Inc.)**

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data processed: email address; phone number; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

# **ZOHO CRM (Zoho Corporation Pvt. Ltd.)**

ZOHO CRM is a User database management service provided by Zoho Corporation Pvt. Ltd.

Personal Data processed: Tracker.

Place of processing: United States – Privacy Policy.

# How We Share Your Information.

We will not rent or sell your information to third parties outside the Owner and its group of affiliated companies (including any parent, subsidiaries and affiliates) without your consent, except as noted below:

- A. Sharing with Third Parties. We may share your information with third-party business partners for the purpose of providing the Services to you. Those business partners will be given limited access to your information as is reasonably necessary to deliver the Services.
- B. Business Transformation. We may buy or sell/divest/transfer the company (including any shares in the company), or any combination of its products, services, assets and/or businesses. The information you provide to us or we collect from you may be among the items sold or otherwise transferred in these types of transactions. We may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of the company.
- C. Pursuant to Lawful Requests. The Owner will disclose your information where required to do so by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security or integrity of our Services; and/or (c) to exercise or protect the rights, property, or personal safety of the Owner, our Users or others.

D. Use of Aggregate or Pseudonymous Information. We may also aggregate or otherwise strip data of all personally identifying characteristics and may share that aggregated, anonymized data with third parties.

# The rights of Users

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

In particular, 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.

#### California Residents.

If you live in California, you have the right to: (1) request that we disclose what Personal Information we collect, use, disclose, and sell; (2) request deletion of Personal Information; (3) opt-out of the sale of Personal Information; and (4) not receive discriminatory treatment by THE OWNER for exercising these rights. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. To make a request on your behalf, an authorized agent may Contact Us in writing with proof of your written and signed permission to do so. Please note, we may require you to verify your identity and confirm that you gave permission.

- i. Requests to Know. California residents have the right to request that we disclose the following information:
  - Specific Personal Information THE OWNER has collected about you;
  - Categories of Personal Information THE OWNER has collected about you, disclosed about you for a business purpose, or sold:
  - Categories of sources from which the Personal Information is collected;
  - Categories of third parties with whom THE OWNER shares or to whom THE OWNER sells Personal Information; and
  - The business or commercial purpose for collecting and selling Personal Information.
  - To make such a request, please Contact Us by email, telephone, or submit the request through your THE OWNER account. In order to verify your request, THE OWNER may require you to provide additional information to confirm the identity of the consumer.
- ii. Requests to Delete. California residents have the right to request that we delete Personal Information about you that we collected and maintain, subject to certain exceptions. To make such a request, please Contact Us by email, telephone, or submit the request through your THE OWNER account. In order to verify your request, THE OWNER may require you to provide additional information to confirm the identity of the consumer. Once we verify your request, we will delete and direct our service providers to delete your Personal Information, unless an exception applies.
- iii. Opt-Out of the Sale of Personal Information. California residents have the right to opt-out of the sale of your Personal Information. To make such a request or to opt-out, please Contact Us by email.

iv. "Shine the Light" Request. California residents may also have the right to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please Contact Us.

# **Cookie Policy**

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

# Additional information about Data collection and processing

**Children's Data.** The Application is not directed to children, and we don't knowingly collect personal information from children under the age of 13. If we find out that a child under 13 has given us personal information, we will take steps to delete that information. If you believe that a child under the age of 13 has given us personal information, please Contact Us.

#### Legal action

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

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

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

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

# System logs and maintenance

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

#### Information not contained in this policy

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

#### 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.

# **Definitions and legal references**

#### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Usage Data**

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

#### User

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

# **Data Subject**

The natural person to whom the Personal Data refers.

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

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

# **Data Controller (or Owner)**

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

# This Application

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

# **Service**

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

# **European Union (or EU)**

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

#### Cookie

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

#### **Tracker**

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

# **Legal information**

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

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

Latest update: August 26, 2021

iubenda hosts this content and only collects the Personal Data strictly necessary for it to be provided.