

# Extended Privacy Policy for **evidencebasedleft.com**

This Website collects some Personal Data from its Users.

## **POLICY SUMMARY**

### **Personal Data processed for the following purposes and using the following services:**

- **Advertising**
  - **Microsoft Advertising and Google AdSense**  
Personal Data: Cookies; Usage Data
  - **Facebook Audience Network**  
Personal Data: Cookies; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data
- **Analytics**
  - **Google Analytics, Google Ads conversion tracking, Hotjar Form Analysis & Conversion Funnels and Wordpress Stats**  
Personal Data: Cookies; Usage Data
- **Contacting the User**
  - **Mailing list or newsletter**  
Personal Data: email address; first name; last name
  - **Contact form**  
Personal Data: email address; first name; last name; phone number
- **Content commenting**
  - **Comment system managed directly**  
Personal Data: Cookies; email address; first name; last name; username
- **Data transfer outside the EU**
  - **Data transfer abroad based on standard contractual clauses, Other legal basis for Data transfer abroad, Data transfer to countries that guarantee European standards, Data transfer from the EU and/or Switzerland to the U.S based on Privacy Shield and Data transfer abroad based on consent**  
Personal Data: various types of Data
- **Displaying content from external platforms**
  - **Google Fonts**  
Personal Data: Usage Data; various types of Data as specified in the privacy policy of the service
  - **Google Maps widget, Vimeo video and YouTube video widget**  
Personal Data: Cookies; Usage Data
  - **Gravatar**  
Personal Data: email address; Usage Data
- **Handling payments**
  - **PayPal and Stripe**  
Personal Data: various types of Data as specified in the privacy policy of the service

- **Heat mapping and session recording**
  - **Hotjar Heat Maps & Recordings**  
Personal Data: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service
- **Registration and authentication**
  - **Direct registration**  
Personal Data: billing address; company name; data relating to the point of sale; email address; first name; last name; password; profile picture; shipping address; username; various types of Data
- **Remarketing and behavioural targeting**
  - **Google Ads Remarketing and Facebook Remarketing**  
Personal Data: Cookies; Usage Data
  - **Facebook Custom Audience**  
Personal Data: Cookies; email address
- **SPAM protection**
  - **Akismet**  
Personal Data: various types of Data as specified in the privacy policy of the service
- **Tag Management**
  - **Google Tag Manager**  
Personal Data: Usage Data
- **Traffic optimization and distribution**
  - **Sucuri CloudProxy**  
Personal Data: various types of Data as specified in the privacy policy of the service
- **User database management**
  - **Infusionsoft**  
Personal Data: various types of Data as specified in the privacy policy of the service

## **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 policy.

## **Further information about the processing of Personal Data**

- **Selling goods and services online**  
The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.  
The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Website depends on the payment system used.
- **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 Website only with the assistance of a parent

or guardian. Under no circumstance persons under the age of 13 may use this Website.

## Contact information

### Owner and Data Controller

Stapleton Family Trust  
ABN 28657722770  
Queensland, Australia (address hidden for privacy)

Owner contact email: [admin@evidencebasedeft.com](mailto:admin@evidencebasedeft.com)

## FULL POLICY

### Owner and Data Controller

Stapleton Family Trust  
ABN 28657722770  
Queensland, Australia  
Owner contact email: [admin@evidencebasedeft.com](mailto:admin@evidencebasedeft.com)

## Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Cookies; Usage Data; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); email address; first name; last name; phone number; username; various types of Data; password; company name; billing address; shipping address; data relating to the point of sale; profile picture.

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 Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website 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 Website or by the owners of third-party services used by this Website 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 Website 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 Website (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: User database management, Advertising, Analytics, Contacting the User, Content commenting, Data transfer outside the EU, Displaying content from external platforms, Handling payments, Heat mapping and session recording, Registration and authentication, Remarketing and behavioral targeting, SPAM protection, Tag Management and Traffic optimization and distribution.

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**

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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 Website, 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 behavioural retargeting technique, i.e. displaying ads tailored to the User's interests and behaviour, including those detected outside this Website. 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.

**Microsoft Advertising (Microsoft Corporation)**

Microsoft Advertising is an advertising service provided by Microsoft Corporation. Personal Data processed: Cookies; Usage Data.

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

**Google AdSense (Google Inc.)**

Google AdSense is an advertising service provided by Google Inc. This service uses the "DoubleClick" Cookie, which tracks use of this Website and User behavior concerning ads, products and services offered.

Users may decide to disable all the Doubleclick Cookies by clicking on: [google.com/settings/ads/onweb/optout](https://google.com/settings/ads/onweb/optout).

Personal Data processed: Cookies; Usage Data.

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

**Facebook Audience Network (Facebook, Inc.)**

Facebook Audience Network is an advertising service provided by Facebook, Inc. **In order to understand Facebook's use of Data, consult [Facebook's data policy](#).**

This Website may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Facebook Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the [Facebook ad settings](#).

Users may opt-out of certain Audience Network targeting through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Audience Network related sections of this privacy policy, if available.

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

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

- **Analytics**

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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 Inc.)**

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

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

Personal Data processed: Cookies; Usage Data.

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

**Google Ads conversion tracking (Google Inc.)**

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

Personal Data processed: Cookies; Usage Data.

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

**Hotjar Form Analysis & Conversion Funnels (Hotjar Ltd.)**

Hotjar is an analytics service provided by Hotjar Ltd.

Hotjar honors generic Do Not Track headers. This means your browser can tell its script not to collect any of your data. This is a setting that is available in all major browsers. Find Hotjar’s [opt-out information here](#).

Personal Data processed: Cookies; Usage Data.

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

**Wordpress Stats (Automattic Inc.)**

Wordpress Stats is an analytics service provided by Automattic Inc.

Personal Data processed: Cookies; Usage Data.

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

- **Contacting the User**

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**Mailing list or newsletter (this Website)**

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 Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

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

**Contact form (this Website)**

By filling in the contact form with their Data, the User authorizes this Website 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: email address; first name; last name; phone number.

- **Content commenting**

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Content commenting services allow Users to make and publish their comments on the contents of this Website.

Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content.

Users are responsible for the content of their own comments.

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

**Comment system managed directly (this Website)**

This Website has its own internal content comment system.

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

- **Data transfer outside the EU**

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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.

**Data transfer abroad based on standard contractual clauses (this Website)**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to "standard contractual clauses" provided by the European Commission.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

Personal Data processed: various types of Data.

**Other legal basis for Data transfer abroad (this Website)**

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 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. In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Website.

Personal Data processed: various types of Data.

**Data transfer to countries that guarantee European standards (this Website)**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission. The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

Personal Data processed: various types of Data.

**Data transfer from the EU and/or Switzerland to the U.S based on Privacy Shield (this Website)**

If this is the legal basis, the transfer of Personal Data from the EU or Switzerland to the US is carried out according to the EU - U.S. and Swiss - U.S. Privacy Shield. In particular, Personal Data is transferred to services that self-certify under the Privacy Shield framework and therefore guarantee an adequate level of protection of such transferred Data. All services are listed within the relevant section of this document and those that adhere to Privacy Shield can be singled out by checking their privacy policy and possibly also by specifically checking for Privacy Shield adherence in the official Privacy Shield List. Privacy Shield also specifically guarantees rights to Users which can be found in its most current form on the website run by the US Department of Commerce.

Personal Data may be transferred from within the EU or Switzerland to the U.S. to services that are not, or not anymore, part of Privacy Shield, only based on other valid legal grounds. Users can ask the Owner to learn about such legal grounds.

Personal Data processed: various types of Data.

**Data transfer abroad based on consent (this Website)**

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 Website.

Personal Data processed: various types of Data.

- **Displaying content from external platforms**

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

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

**Google Fonts (Google Inc.)**

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

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

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

**Google Maps widget (Google Inc.)**

Google Maps is a maps visualization service provided by Google Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

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

**Gravatar (Automattic Inc.)**

Gravatar is an image visualization service provided by Automattic Inc. that allows this Website to incorporate content of this kind on its pages.

Please note that if Gravatar images are used for comment forms, the commenter's email address or parts of it may be sent to Gravatar - even if the commenter has not signed up for that service.

Personal Data processed: email address; Usage Data.

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

**Vimeo video (Vimeo, LLC)**

Vimeo is a video content visualization service provided by Vimeo, LLC that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

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

**YouTube video widget (Google Inc.)**

YouTube is a video content visualization service provided by Google Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Cookies; Usage Data.

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

- **Handling payments**

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Payment processing services enable this Website to process payments by credit card, bank transfer or other means. To ensure greater security, this Website shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction.

Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

**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](#).

**Stripe (Stripe Inc)**

Stripe is a payment service provided by Stripe Inc.

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

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

- **Heat mapping and session recording**

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Heat mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

### **Hotjar Heat Maps & Recordings (Hotjar Ltd.)**

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

Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

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

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

- **Registration and authentication**

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By registering or authenticating, Users allow this Website 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 Website will be able to access some Data, stored by these third-party services, for registration or identification purposes.

#### **Direct registration (this Website)**

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

Personal Data processed: billing address; company name; data relating to the point of sale; email address; first name; last name; password; profile picture; shipping address; username; various types of Data.

- **Remarketing and behavioral targeting**

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This type of service allows this Website and its partners to inform, optimize and serve advertising based on past use of this Website by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

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

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the [Network Advertising Initiative opt-out page](#).

**Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.**

#### **Google Ads Remarketing (Google LLC)**

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Cookies; Usage Data.

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

#### **Facebook Remarketing (Facebook, Inc.)**

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Website with the Facebook advertising network.

Personal Data processed: Cookies; Usage Data.

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

#### **Facebook Custom Audience (Facebook, Inc.)**

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Website with the Facebook advertising network.

Personal Data processed: Cookies; email address.

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

- **SPAM protection**

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

**Akismet (Automattic Inc.)**

Akismet is a SPAM protection service provided by Automattic Inc.

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

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

- **Tag Management**

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This type of service helps the Owner to manage the tags or scripts needed on this Website in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

**Google Tag Manager (Google LLC)**

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Usage Data.

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

- **Traffic optimization and distribution**

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This type of service allows this Website to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

**Sucuri CloudProxy (Sucuri, Inc.)**

Sucuri CloudProxy is a traffic optimization and distribution service provided by Sucuri, Inc.

The way Sucuri CloudProxy is integrated means that it filters all the traffic through this Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

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

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

- **User database management**

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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 Website, 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 Website.

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 Website.

#### **Infusionsoft (Infusion Software, Inc.)**

Infusionsoft is a User database management service provided by Infusion Software, Inc.

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

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

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

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

### **Further information about the processing of Personal Data**

- **Selling goods and services online**

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.

The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged.

The kind of Data collected by this Website depends on the payment system used.

- **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 Website only with the assistance of a parent or guardian.

Under no circumstance persons under the age of 13 may use this Website.

### **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.

## **Cookie Policy**

This Website uses Trackers. To learn more, the User may consult the [Cookie Policy](#).

## **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 Website 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 Website 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 Website and any third-party services may collect files that record interaction with this Website (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 Website 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 Website 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**

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### **Personal Data (or Data)**

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

### **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, 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 Website 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 Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

### **This Website (or this Application)**

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

### **Service**

The service provided by this Website 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.

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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 Website, if not stated otherwise within this document.

Latest update: July 05, 2018

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