# **Privacy Policy of 123Play**

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.

## **Owner and Data Controller**

123Play, David Buhauer C.F. Jessens vej 1, 3.tv. Aarhus N, 8200 Denmark.

Owner contact email: developer@dab-it.dk

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: email address; Cookies; Usage Data; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); geographic position.

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.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

## 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.

## 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.

## **Retention time**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## 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: Contacting the User, Advertising, Infrastructure monitoring and Displaying content from external platforms.

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.

#### AdMob (AdMob Google Inc.)

AdMob is an advertising service provided by AdMob Google Inc. In order to understand Google's use of Data, consult <u>Google's partner policy</u>.

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

Place of processing: US – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Google AdSense (Google Inc.)

Google AdSense is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. This service uses the "DoubleClick" Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered. Users may decide to disable all the DoubleClick Cookies by going to: <u>Google Ad Settings</u>.

In order to understand Google's use of data, consult Google's partner policy.

Personal Data processed: Cookies; Usage Data.

Place of processing: US - Privacy Policy - Opt Out.

## **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: email address.

## **Displaying content from external platforms**

This type of services allows you to view content hosted on external platforms directly from the pages of this Application 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.

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

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

Personal Data processed: Cookies; Usage Data.

Place of processing: US – <u>Privacy Policy</u>.

### 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.

#### Crashlytics (Google Inc.)

Crashlytics is a monitoring service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: geographic position; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

Place of processing: US – <u>Privacy Policy</u>.

## 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 follow the instructions provided by <u>YourOnlineChoices</u> (EU), the <u>Network Advertising Initiative</u> (US) and the <u>Digital</u> <u>Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interestbased advertising on mobile apps.

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.

## Further information about the processing of Personal Data

### themoviedb.org

**Privacy Policy** 

Welcome to our website located at www.themoviedb.org (the 'website'). This website is operated by Fanhattan, Inc. and/or its corporate affiliates ('Fanhattan').

Review Fanhattan's legal and privacy notices for details on how we collect, use and protect your personal information on the website.

Your use of and access to any website or software application or service owned by Fanhattan (Fanhattan Property(ies)') either (i) made available to you directly or indirectly from this website; or (ii) with a direct link to this privacy policy is subject to this privacy policy. This privacy policy explains the data that we collect and how we use it.

We respect your privacy. If you have any privacy concerns or questions about this privacy policy, you can contact us by email at: privacy@fan.tv.

Contents About us Your information Which organizations collect the information Advertising Security Children Unsubscribing and Opting Out Other disclosures Overseas transfers Your consent

#### Your rights ABOUT US AND THIS POLICY All references to "we", "us" or "our" refer to (1) Fanhattan, Inc. and/or one or more of its corporate affiliates.

Fanhattan, Inc. is a Delaware corporation, with offices at 489 S. El Camino Real, San Mateo, CA 94402.

This policy gives you the details of who we are and the details of our privacy policies, including: what data we collect about you when you use a Fanhattan Property; what organization is collecting the information; how the information will be used or disclosed; what choices are available to you regarding collection and use of the data; what security measures are in place to protect your personal information; and how you can correct any inaccuracies in the information. Information collected or provided by or to us may be shared with and used by any of our affiliates in accordance with this Privacy Policy as if the relevant affiliate was 'we' 'us' or 'our' in this Policy.

This policy may be amended from time to time without notice and it is your responsibility to read it carefully and review any changes that may have been made. Since changes will be posted on this page, we encourage you to check this page regularly.

This policy, the processing of your online account data and any other data we collect shall be governed by the laws of the State of California and shall be subject to the exclusive jurisdiction of the courts in Santa Clara, California.

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#### YOUR INFORMATION: WHAT WE COLLECT, HOW WE COLLECT IT, AND HOW IT IS USED

In common with most other websites and on-line services, we collect certain data about your visit to the FanTV Properties. Any data we gather through your use of Fanhattan Property falls into three categories: (1) personal information that you supply to us, such as information you provide when you register (including your e-mail address), create an account, create a username, register your device, complete a survey, enter a contest, or purchase products or services; (2) information that is collected as you use Fanhattan Property that becomes identified with your personal information; and (3) information that does not directly identify you and is collected as you use Fanhattan Property, including your IP address, and information gathered with the use of a "cookie" (cookies are discussed further below), and information related to searches or recommendations on Fanhattan Property. Such information collected includes, without limitation, which pages and content are browsed, interactions with advertising and content, and other data related to preferences and usage. We use this information including, without limitation, to provide our services to you, create new products and services, to better target advertising and content, (on our and our business associates' websites) to generate statistics, reports and for various analytic purposes (including combining the data we collect with data from other sources).

You may use certain Fanhattan Property without registering or creating an account. We may nonetheless build a history of your interactions with the Fanhattan Property even though we don't know who you are.

Regarding Fanhattan Properties that are products, Fanhattan may also employ update management software to collect installation and registry information from your computer, including product, version, build, language and original equipment manufacturer. Where you use multiple Fanhattan Properties, Fanhattan may combine or link information collected from various Fanhattan Properties and use it for the purposes outlined in this privacy policy.

#### Personal information

As is common across websites, to use certain features of Fanhattan Property we may ask you to register, create an account, provide your full name and email address and create a password. Once you have created an account, you will have the option to fill out a form (all or portions of which may be included in your profile). When you create your profile, we collect personal information about you, such as name, address, location, e-mail address, favorite actors, music, etc. which will be stored in order to provide services to you and to conduct activities including, without limitation, using it to process your registration, maintain a profile about you, process your request to receive newsletters and email announcements, or to voluntarily participate in surveys or contests and/or to communicate with you about services and products we think may be of interest to you.

Fanhattan may allow you to set up profiles that may be viewed by other users of the Fanhattan Properties. To enrich your profile you may chose to include some personal information in your public profile so that other users can identify you. You should only include information in your public profile that you do not mind making publicly available without restriction.

To process your purchase orders we require your name, billing address, phone number, email address, shipping address, credit card information and credit card security codes. We use this information to process

your order and, if any questions arise, to contact you about your order. We may also use it to contact you about other products and services we feel may be of interest to you. In general Fanhattan will try to email you first but may phone or send an electronic message to you if you have provided these details and you consent to our so doing.

Personal information is also used to provide personalised services to you, such as show tracking and recommendations.

We may provide data about our users, traffic patterns, products, services and site information to thirdparties (such as vendors, advertisers and our business associates) ('Third Parties"), but, except as otherwise described in this policy, we will use reasonable efforts to provide it in a form that does not directly identify you.

Creation of Anonymous Data. We may create Anonymous Data records from Personal Data by excluding information (such as your name) that makes the data personally identifiable to you. Once we create Anonymous Data this Anonymous Data is our property. We use this Anonymous Data in many ways including analyzing request and usage patterns, creating reports and performing analytics so that we may enhance the content of our Services, improve Site navigation and provide meaningful analysis of habits, usage, trends, and effectiveness of marketing campaigns etc. as part of our analytics and other services. Company reserves the right to use and disclose Anonymous Data to Third Party Companies in its absolute discretion.

Social Media and Profiles. For certain Fanhattan Properties the information that we may ask you to provide could include name, gender, location, email address, biographical information and the movies and television shows that you like to watch. When you create your profile, you may be asked if you want your profile to be public or private. Unless you state that you want your profile to be private your profile will be available for public viewing.

Public Content. Your photos, posts, friends, and other content you post to the Fanhattan Properties (and your Profile if you designate it as public, including your first name and last initial but excluding any other account registration information) are meant for public consumption. We may display this content on the Fanhattan Properties and further distribute it to a wider audience through third party sites and services.

Facebook and other Social Networking Sites. If you are logged into Facebook or another Social Networking Site ("SNS") that we support, and you access but are not logged into the Fanhattan Property, we may receive information from Facebook or the SNS to make it easier for you to create an account on the Fanhattan Property and to show our relevant content from your Facebook or SNS friends. This information personalizes your experience and helps you create an account (where this facility is available). You may also be able to connect your account on the Fanhattan Property to your accounts on Facebook or other SNSs, in which case we may collect and store information identifying your account with the third party service. We use this information to help you connect and share public content with your friends and followers.

Material You Choose to Reveal in On-line Fora, Blogs, Message Boards, Chat Rooms or Similar Locations. You may be able to post personal information on areas of a Fanhattan Property that may be viewed by other users or the public, although we recommend that you do not do so. Please note that there are risks, including but not limited to the risk of physical harm, of dealing with strangers, including persons who may be acting under false pretenses. Please choose carefully the information you post on the Fanhattan Property and that you give to other Fanhattan Property users. You are discouraged from publicly posting your full name, telephone numbers, street addresses or other information that identifies you or allows strangers to find you or steal your identity. Despite this prohibition, other people's information may be offensive, harmful or inaccurate, and in some cases will be mislabeled or deceptively labeled.

YOU ASSUME ALL RISKS ASSOCIATED WITH DEALING WITH OTHER USERS WITH WHOM YOU COME IN CONTACT THROUGH Fanhattan PROPERTIES. WE EXPECT THAT YOU WILL USE CAUTION AND COMMON SENSE WHEN USING Fanhattan PROPERTIES.

#### Tracking and Cookies

When you visit Fanhattan websites and other Fanhattan Properties, we and our advertising associates may store and access information from your device, including "cookies", clear GIFs (which are also sometimes called web bugs or web beacons) and browser details. We may collect information such as your browser type, the type of operating system you use, the domain name of your Internet service provider, IP address, pages visited on the site, services used and how you have used them. We and our advertising associates do this for a variety of purposes. In the case of our advertising associates, this may include the personalisation of advertisements based on your visits to sites in that party's network. Please note that Fanhattan Properties do not currently respond to a web browser's "do not track" instructions (e.g., a "do not track" signal). However, we may use Google analytics. Google analytics manages 'Do Not Track' instructions from your browser in accordance with its own privacy policies at http://www.google.com/intl/en/policies/privacy/.

Consent for the use of cookies.

If you continue to use this Fanhattan Property, we will imply from this that you consent to our use of cookies.

#### Fanhattan Email

Email addresses are used for identification, inviting new friends to Fanhattan Properties, searching for and finding friends, general communication, order processing and to send notifications to you. To facilitate searching for and finding friends on the Fanhattan Properties, Fanhattan allows users to search for other members using text searches, first and last name, email address, and by using other attributes. Users can invite friends to join certain Fanhattan Properties by sending invitation emails via our automated invitation system. Where permitted by applicable law, Fanhattan stores these email addresses so that the respondents may be added to the friend list of the member sending the invitations and to establish relationships between users.

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#### WHICH ORGANIZATIONS ARE COLLECTING THE INFORMATION?

When you provide information to Fanhattan, that information is collected and maintained either by Fanhattan or by an authorized agent or contractor of Fanhattan such as (without limitation) web hosting companies, customer care service providers, and/or transaction processing service providers, unless specifically stated otherwise at the point of collection.

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#### ADVERTISING

We may use your personal information and non-personal information to serve ads to you via Fanhattan Property as well as to provide you with promotions, products and services. We may also use third-party advertising companies and other business associates to serve ads on Fanhattan Property or other Sites and provide you with promotions, products and services. These third-party advertising companies and our business associates may be located throughout the world.

These third-party advertising companies and business associates may receive and share with us information relating to the advertisements that they serve you including, without limitation, date and time of ad shown, the ad that was shown and your IP address and your interactions with such advertisements. These third-party advertising companies and business associates may use cookies, clear GIFs and anonymous information about your visits to Fanhattan Property and other websites to measure and improve the effectiveness of their ads, promotions, products and services. This information may also be used for online preference and other targeted marketing purposes. The information received by these third-party advertising companies and business associates is subject to the privacy policies of these third-party advertising companies and business associates. We may be given access to this information by these third-party advertising companies and business associates which we may use for purposes including, without limitation, to provide services to you, to better target advertising and content to you and to generate statistics and reports and to carry out analytics that help us to provide our services, to create new products and services, to better target advertising and content, (on our and our business associates' websites, applications and devices) to generate statistics, reports and for various analytic purposes. We may make certain information about you available to third-party advertising companies and other business associates under agreements between us and those third-party advertising companies and business associates. The third-party advertising companies and business associates will use that information to target advertising to you or provide and market promotions, products and services to you. You may withdraw your consent to our sending your personal information to advertising companies and business associates by sending us a written e-mail request from the e-mail address that is registered with us. If you do so we will not provide your personal information from the relevant Fanhattan Property to third party advertisers or business associates from the time you opt out. However where permitted by applicable law, we may still provide them with information that does not directly identify you from which they may send you targeted advertisements.

Many of our advertising associates are part of the Network Advertising Initiative. You may opt-out of behavioral advertising for Network Advertising Initiative member companies by following the link below and opting-out of all or some of the advertising networks: http://www.networkadvertising.org/managing/opt\_out.asp

Opting out of Flash Cookies is described above in the tracking information section.

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#### **SECURITY & RETENTION POLICIES**

We use commercially reasonable efforts to safeguard the confidentiality of your personal information. However, due to the design of the Internet, ever-changing technology and other factors outside of our control, we cannot guarantee that communications between you and our servers will be free from unauthorized access by third parties or that we will not be subject to security breaches. We will have no liability for disclosure of personal information due to errors in transmission or unauthorized or unlawful acts of third parties.

You are responsible for the security of your user name, ID and password for any of the Fanhattan Properties. Please take care when using and storing them.

Our Policy is to retain your personal data during such time as it is relevant to us. We may retain your personal data for up to 3 years from the last interaction with you. Anonymous data is not subject to this retention policy and we may keep and use it indefinitely.

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#### COMMITMENT TO CHILDRENS' PRIVACY

Protecting the privacy of children is important to us. For that reason, none of our Fanhattan Properties are directed at anyone under 13 and they are not structured specifically to attract anyone under 13. We also do not collect or maintain personal information from those users who we actually know are under 13. Should we learn or be notified that we have collected information from users under the age of 13, we will immediately delete such personal information.

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#### UNSUBSCRIBING AND OPTING OUT

When you register to access certain Fanhattan Properties, you provide us with personal information for us to contact you (including sending you marketing material). You can let us know that you do not wish to receive announcements or marketing material from us by either e-mailing us (from the account registered with us) with a written request to opt out of receiving further materials from us or opting out from the marketing material by using the 'unsubscribe' function in these marketing materials. If you opt out or do not provide your personal information then some services and features (such as personal information services, recommendations and tracking of ratings and likes and dislikes) may not be available to you or may be deleted. All newsletters and email announcements from us will contain an unsubscribe link that also allows you to opt out at any time from these messages.

#### Review and Correction

Where you have registered to access certain Fanhattan Properties, you may review and update the personal information that you have provided us by visiting the relevant set up page of the Fanhattan Property and updating your account profile (where this function exists) or emailing to us the request for change from the email account that is registered with us).

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#### OTHER DISCLOSURE OF PERSONAL INFORMATION

We will not otherwise use or disclose your personal information without your consent except (i) as described in this privacy policy, (ii) as required by court order or other government or law enforcement authorities in order to comply with legal process or law, (iii) in the event of a merger where another company has acquired the relevant Fanhattan Property, (iv) in order to protect against the misuse or unauthorized use of Fanhattan Property, (v) in order to protect and defend our rights and property, or (vi) in order to protect the personal safety or property of our users or the public.

If Fanhattan sells assets (or the assets of a division or subsidiary) to another entity, including, without limitation, in the event of bankruptcy, or if Fanhattan (or a division or subsidiary) is acquired by, or merged with, another entity, Fanhattan may provide to such entity user information (both anonymized and/or aggregate and personal information) that is related to that part of the business that was sold to or merged with the other entity.

#### Links to Third Party Websites

Fanhattan Properties may display links to websites operated by third parties. If you click on a link, the relevant third party operator or others may collect data about you when you visit the linked website. They are responsible for the collection and further processing of such data and we have no control over it. We advise you to check the terms of use and privacy policies of any linked websites you visit to find out what data they are collecting and the purposes for which they process your personal data.

#### OVERSEAS TRANSFERS AND PROCESSING OF YOUR INFORMATION

Your personal information may be used by us and our affiliates, subsidiaries and our suppliers who may be located in countries outside the country where you are located for the purposes outlined in this policy. The data protection laws in these countries may not offer the same level of protection as those in the country where you are located. By providing your personal information to us you understand and expressly consent to us and our business associates and suppliers processing your data in any jurisdiction, including without limitation the United States of America, in accordance with this privacy policy.

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#### YOUR CONSENT

BY USING ANY Fanhattan PROPERTIES, YOU ARE CONSENTING TO THE COLLECTION AND USE OF YOUR INFORMATION DESCRIBED IN THIS PRIVACY POLICY AND YOU ACCEPT AND AGREE TO THIS PRIVACY POLICY.

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#### YOUR RIGHTS

Your California Privacy Rights

If you are a resident of the State of California, we provide you in this Privacy Policy with information on how to exercise your disclosure choice options such as your right to opt-out (or "unsubscribe") of our use and sharing of your Personal Information for marketing purposes. Therefore, pursuant to the California Civil Code, we are not required to maintain or disclose a list of the third parties that received your Personal Information for marketing year.

If you are a California resident and wish to request information about how to exercise your third party disclosure choices, please send a request by email to our Privacy Administrator at privacy@fan.tv or by postal mail to Fanhattan Inc. 489 S. El Camino Real, San Mateo, CA 94402. Attn: Your California Privacy Rights, c/o Privacy Administrator, Legal Department. All requests must be labelled "Your California Privacy Rights" in the email subject line or envelope or post card. For all requests, please clearly state that the request is related to "Your California Privacy Rights", include your name, street address, city, state, zip code and e-mail address (your street address is optional if you wish to receive a response to your request via email) and indicate your preference on how our response to your request should be sent (email or postal mail). We are unable to accept requests via the telephone or by facsimile. We are not responsible for notices that are not labelled or sent properly, or do not have complete information.

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Inquiries

If you have any concern about privacy at Fanhattan, please send us a thorough description of your concern to privacy@fan.tv or the address above, and we will try to resolve it.

This privacy policy was last updated on: March 10, 2015.

## **Further Information for Users**

### 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.
- provision of Data is necessary for the performance of an agreement with the User and/or for any precontractual 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.

### Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

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 fulfil 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 rights of Users based on the General Data Protection Regulation (GDPR)

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

In particular, Users have the right to do the following, to the extent permitted by law:

- 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.
- 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 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 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.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including 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.

#### 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, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. 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. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure

of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## 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 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) or 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.

## 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 Processor)**

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

Latest update: September 28, 2023