

# Privacy Policy of valap

Valap collects some Personal Data from its Users.

## Owner and Data Controller

**VenteALaPropriete.com S.A.S.**

200 Boulevard de la Resistance

71000 - Mâcon - France

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

## Types of Data collected

Among the types of Personal Data that valap collects, by itself or through third parties, there are: Trackers; Usage Data; email address; number of Users; session statistics; Data communicated while using the service; IP address; various types of Data; password; phone number; User ID.

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 valap.

Unless specified otherwise, all Data requested by valap is mandatory and failure to provide this Data may make it impossible for valap to provide its services. In cases where valap 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 valap or by the owners of third-party services used by valap 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.

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

## 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 valap (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: Advertising, Analytics, Tag Management, Interaction with support and feedback platforms, Interaction with live chat platforms, Heat mapping and session recording, Displaying content from external platforms, Collection of privacy-related preferences, Traffic optimization and distribution, Platform services and hosting, Contacting the User, Registration and authentication provided directly by valap, Data transfer outside the EU, Registration and authentication, Managing support and contact requests and Handling payments.

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 valap, 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 valap.

For more information, please check the privacy policies of the relevant services.

Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

#### Criteo (Criteo SA)

Criteo is an advertising service provided by Criteo SA.

As part of the operation of valap, the Owner and Criteo SA are joint controllers for the Criteo advertising service.

For this purpose, the Owner has entered into a Data Processing Agreement (DPA) with Criteo SA which can be reviewed [here](#).

Users may at any time **withdraw their consent** to the processing of their Personal Data by Criteo and **opt out of personalized advertising by clicking the “Disable Criteo services”** button in Criteo’s [privacy policy](#).

Personal Data processed: Trackers; Usage Data.

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

#### Google AdSense (Google Ireland Limited)

Google AdSense is an advertising service provided by Google Ireland Limited. This service uses the “DoubleClick” Cookie, which tracks use of valap and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: Trackers; Usage Data.

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

#### Outbrain (Outbrain Inc.)

Outbrain is an advertising service provided by Outbrain Inc.

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

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

#### Taboola (Taboola Inc.)

Taboola is an advertising service provided by Taboola Inc.

Personal Data processed: Trackers; Usage Data.

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

### **Microsoft Advertising (Microsoft Corporation)**

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Trackers; Usage Data.

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

### **Meta ads conversion tracking (Meta pixel) (Meta Platforms Ireland Limited)**

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms Ireland Limited that connects data from the Meta Audience Network with actions performed on valap. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

### **Pinterest Ads (Pinterest, Inc.)**

Pinterest Ads is an advertising service provided by Pinterest, Inc. that allows the Owner to run advertising campaigns on the Pinterest advertising network.

Users may opt out of behavioral advertising features through their device settings, their Pinterest [personalization settings](#).

Personal Data processed: Trackers; Usage Data; User ID.

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

### **vidence (vidence)**

vidence is an advertising service provided by iveness.

Personal Data processed: Trackers; Usage Data.

Place of processing: France – [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.

### **Meta Events Manager (Meta Platforms Ireland Limited)**

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on valap.

Personal Data processed: Trackers; Usage Data.

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

### **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of valap, 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.

In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google’s official documentation](#).

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: number of Users; session statistics; Trackers; Usage Data.

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

## **Collection of privacy-related preferences**

This type of service allows valap to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

### **iubenda Consent Database (iubenda srl)**

The iubenda Consent Database allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; IP address; Trackers.

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

### **iubenda Privacy Controls and Cookie Solution (iubenda srl)**

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information, and in particular to the use of Cookies and other Trackers on valap.

Personal Data processed: IP address; Trackers.

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

## **Contacting the User**

### **Contact form (valap)**

By filling in the contact form with their Data, the User authorizes valap 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; various types of Data.

### **Phone contact (valap)**

Users that provided their phone number might be contacted for commercial or promotional purposes related to valap, as well as for fulfilling support requests.

Personal Data processed: phone number.

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of valap and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction.

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 Ireland Limited)**

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

Personal Data processed: Trackers; Usage Data.

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

## **Handling payments**

Unless otherwise specified, valap 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. Valap 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.

### **PayZen (Lyra SAS)**

PayZen is a payment service provided by Lyra SAS, which allows the User to make online payments.

Personal Data processed: surname; purchase history; email; billing address; payment information; name; Tracking Tools; various types of Data as specified in the privacy policy of the service.

Place of processing: See PayZen's privacy policy - [Privacy Policy](#).

## **Heat mapping and session recording**

Heat mapping services are used to display the areas of valap that Users interact with most frequently. 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.

### **Crazy Egg (Crazyegg)**

Crazy Egg is a heat mapping service provided by Crazy Egg, Inc.

Personal Data processed: Trackers; Usage Data.

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

## **Interaction with live chat platforms**

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

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

### **Zendesk Chat (Zendesk, Inc.)**

Zendesk Chat is a service for interacting with the Zendesk live chat platform provided by Zendesk, Inc.

Personal Data processed: email address; Usage Data.

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

## **Interaction with support and feedback platforms**

This type of service allows Users to interact with third-party support and feedback platforms directly from the pages of valap.

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

### **Zendesk Widget (Zendesk, Inc.)**

The Zendesk Widget is a service for interacting with the Zendesk support and feedback platform provided by Zendesk Inc.

Personal Data processed: email address; Usage Data.

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

## **Managing support and contact requests**

This type of service allows valap to manage support and contact requests received via email or by other means, such as the contact form.

The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

### **Zendesk (Zendesk, Inc.)**

Zendesk is a support and contact request management service provided by Zendesk Inc.

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

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

## **Platform services and hosting**

These services have the purpose of hosting and running key components of valap, therefore allowing the provision of valap 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.

### **App Store Connect (Apple Inc.)**

Valap is distributed on Apple's App Store, a platform for the distribution of mobile apps, provided by Apple Inc.

App Store Connect enables the Owner to manage valap on Apple's App Store. Depending on the configuration, App Store Connect provides the Owner with analytics data on user engagement and app discovery, marketing campaigns, sales, in-app purchases, and payments to measure the performance of valap. App Store Connect only collects such data from Users who have agreed to share them with the Owner. Users may find more information on how to opt out via their device settings [here](#).

Personal Data processed: Trackers; Usage Data.

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

### **Google Play Store (Google Ireland Limited)**

Valap is distributed on the Google Play Store, a platform for the distribution of mobile apps, provided by Google Ireland Limited.

By virtue of being distributed via this app store, Google collects usage and diagnostics data and share aggregate information with the Owner. Much of this information is processed on an opt-in basis.

Users may opt-out of this analytics feature directly through their device settings. More information on how to manage analysis settings can be found on [this page](#).

Personal Data processed: Usage Data.

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

## **Registration and authentication**

By registering or authenticating, Users allow valap 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, valap will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

### **Facebook Oauth (Meta Platforms Ireland Limited)**

Facebook Oauth is a registration and authentication service provided by Meta Platforms Ireland Limited and is connected to the Facebook social network.

Personal Data processed: Trackers; various types of Data.

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

### **Google OAuth (Google Ireland Limited)**

Google OAuth is a registration and authentication service provided by Google Ireland Limited and is connected to the Google network.

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

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

### **Sign in with Apple (Apple Inc.)**

Sign in with Apple is a registration and authentication service provided by Apple Inc. In cases where Users are required to provide their email address, Sign in with Apple may generate a private relay address on behalf of Users that automatically forwards messages to their verified personal email account - therefore shielding their actual email address from the Owner.

Personal Data processed: email address.

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

## **Registration and authentication provided directly by valap**

By registering or authenticating, Users allow valap 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 (valap)**

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

Personal Data processed: email address; password.

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on valap 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 Ireland Limited)**

Google Tag Manager is a tag management service provided by Google Ireland Limited.

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: Usage Data.

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

## **Traffic optimization and distribution**

This type of service allows valap 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 valap 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.

### **Cloudflare (Cloudflare, Inc.)**

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

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

Personal Data processed: Trackers; 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**

### **Applicable Websites**

The privacy policy applies to ventealapropriete.com and its country-specific versions, including ventealapropriete.be, valap.de, valap.es, valap.it, valap.nl, and valap.pt.

### **Analysis and predictions based on the User's Data (“profiling”)**

The Owner may use the Personal and Usage Data collected through valap to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.

User profiles can also be created through the use of automated tools like algorithms, which can also be provided by third parties. To find out more about the profiling activities performed, Users can check the relevant sections of this document.

The User always has a right to object to this kind of profiling activity. To find out more about the User's rights and how to exercise them, the User is invited to consult the section of this document outlining the rights of the User.

## Cookie Policy

Valap uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## 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 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.

### 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.

### **Transfer of Personal Data outside of the European Union**

#### **Data transfer abroad based on standard contractual clauses**

If this is the condition for Data transfer, 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.

## **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 valap 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, valap 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, valap and any third-party services may collect files that record interaction with valap (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 valap 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 valap (or third-party services employed in valap), which can include: the IP addresses or domain names of the computers utilized by the Users who use valap, 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 valap 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 valap. The Data Controller, unless otherwise specified, is the Owner of valap.

### **valap (or this Application)**

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

### **Service**

The service provided by valap 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 valap, if not stated otherwise within this document.

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