

# Privacy Policy of Difference Games LLC Apps

This Application collects some Personal Data from its Users.

Users may be subject to different protection standards and broader standards may therefore apply to some. Users can contact the Owner, to learn more about such standards.

This document contains [a section dedicated to Users in the European Union and their privacy rights](#).

This document contains [a section dedicated to Users in the United States and their privacy rights](#).

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

## Owner and Data Controller

Difference Games LLC

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

## Types of Data collected

Among the types of Personal Data that this Application 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; username; picture; geographic position; language; device information; geography/region; number of Users ; number of sessions; session duration; In-app purchases; Application opens; Application updates; launches; operating systems; Universally unique identifier (UUID); crash data; payment info; purchase history.

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

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application. Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

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

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

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: Advertising, Advertising serving infrastructure, Analytics, Contacting the User, Handling payments, Hosting and backend infrastructure, Interaction with external social networks and platforms, Managing contacts and sending messages, Registration and authentication, Remarketing and behavioral targeting, Social features, Traffic optimization and distribution, Infrastructure monitoring and Platform services and hosting.

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

## **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.

#### **AdColony (Jirbo, Inc.)**

AdColony is an advertising service provided by AdColony, Inc.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

#### **AdMob (AdMob Google Inc.)**

AdMob is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

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

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

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

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **Amazon Mobile Ads (Amazon)**

Amazon Mobile Ads is an advertising service provided by Amazon or by Amazon Europe , depending on how the Owner manages the Data processing.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **AppLovin (AppLovin Corporation)**

AppLovin is an advertising service provided by AppLovin Corporation.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **Fyber (SponsorPay GmbH)**

Fyber is an advertising service provided by Fyber Monetization Ltd.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **MoPub (MoPub Inc.)**

MoPub is an advertising service provided by MoPub Inc.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **ironSource (SupersonicAds Ltd.)**

ironSource is an advertising service provided by ironSource Ltd.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **Unity Ads (Unity Technologies ApS)**

Unity Ads is an advertising service provided by Unity Technologies ApS.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **Vungle (Vungle, Inc.)**

Vungle is an advertising service provided by Vungle, Inc.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **Meta ads conversion tracking (Meta pixel) (Facebook, Inc.)**

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Meta Audience Network with actions performed on this Application. 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: US – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

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

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on this Application.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

### **X Ads conversion tracking (X Corp.)**

X Ads conversion tracking is an analytics service provided by X Corp. that connects data from the X advertising network with actions performed on this Application.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

### **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 Application 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: Tracker; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

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

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **Tapjoy (Tapjoy, Inc.)**

Tapjoy is an advertising service provided by Tapjoy, Inc.

Personal Data processed: Tracker; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **PubMatic (PubMatic, Inc.)**

PubMatic is an advertising service provided by PubMatic, Inc.

Personal Data processed: Tracker; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **TripleLift (TripleLift, Inc.)**

TripleLift is an advertising service provided by TripleLift, Inc.

Personal Data processed: Tracker; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **Mintegral (Mintegral International Limited)**

Mintegral is an advertising service provided by Mintegral International Limited.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### **Liftoff (Liftoff Mobile, Inc.)**

Liftoff is an advertising service provided by Liftoff Mobile, Inc.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### **Digital Turbine (Triapodi Ltd.)**

Digital Turbine is an advertising service provided by Triapodi Ltd.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### **Chartboost (Chartboost, Inc.)**

Chartboost is an advertising service provided by Chartboost Inc.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### **Singular Ads (Dando online LTD)**

Singular Ads is an advertising service provided by Dando online LTD.

Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## Advertising serving infrastructure

This type of service has the purpose of providing an advertising serving infrastructure that enables this Application to maintain its own network that serves optimized and targeted advertisements.

To this end, the services listed below may allow the Owner to track unique User visits and their navigation patterns, also with the help of Cookies.

This tracking may occur across different sites or apps, in order to serve optimized and targeted advertisements.

### OpenX Ad Server (OpenX Technologies, Inc.)

OpenX Ad Server is an advertising server provision service provided by OpenX Technologies, Inc.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

## 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.

### Appsee (Shift 6 Ltd)

Appsee is an analytics service provided by Shift 6 Ltd.

This service is designed for mobile apps analytics and can collect various information about the User's device, highlighted in the Appsee privacy policy.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

### Appsflyer (AppsFlyer Ltd)

Appsflyer is an analytics service provided by AppsFlyer Ltd.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

### Facebook Analytics for Apps (Facebook, Inc.)

Facebook Analytics for Apps is an analytics service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing,

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

#### **Google Analytics (Universal Analytics) (Google Inc.)**

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

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](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in the United States

#### **Unity Analytics (Unity Technologies ApS)**

Unity Analytics is an analytics service provided by Unity Technologies ApS.

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

#### **Google Analytics for Firebase (Google LLC)**

Google Analytics for Firebase or Firebase Analytics is an analytics service provided by Google LLC.

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

Firebase Analytics may share Data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. The User may check this privacy policy to find a detailed explanation about the other tools used by the Owner.

This Application uses identifiers for mobile devices and technologies similar to cookies to run the Firebase Analytics service.

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

Personal Data processed: Application opens; Application updates; device information; geography/region; In-app purchases; launches; number of sessions; number of Users ; operating systems; session duration; Tracker; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

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

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; geolocation data.

This processing constitutes:

- a sale in California

#### **Chartbeat (Chartbeat)**

Chartbeat is an analytics service provided by Chartbeat Inc.



Personal Data processed: Trackers; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Contacting the User**

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

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

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

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana

### **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; first name; last name.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

## **Handling payments**

Payment processing services enable this Application to process payments by credit card, bank transfer or other means. To ensure greater security, this Application 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.

### **Google Pay (Google Inc.)**

Google Pay is a payment service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, which allows users to make online payments using their Google credentials.

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

### **Apple Pay (Apple Inc.)**

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

### **Amazon Payments (Amazon)**

Amazon Payments is a payment service provided by Amazon.com, Inc., which allows Users to make online payments using their Amazon credentials.

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

### **Payments processed via the Google Play Store (Google LLC)**

This Application uses a payment service provided by Google LLC that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Google, as described in the [privacy policy for the Google Play store](#).

Personal Data processed: device information; payment info; purchase history; Tracker; Usage Data.

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

Category of Personal Information collected according to the CCPA: commercial information; internet or other electronic network activity information.

This processing constitutes:

### **Hosting and backend infrastructure**

This type of service has the purpose of hosting data and files that enable this Application to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Application. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

#### **Amazon Web Services (AWS) (Amazon)**

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

#### **Firebase Hosting (Firebase, Inc.)**

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

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

### **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 LLC)**

Crashlytics is a monitoring service provided by Google LLC.

Personal Data processed: crash data; device information; Universally unique identifier (UUID).

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

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

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

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

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

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

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

### **Facebook Like button and social widgets (Facebook, Inc.)**

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing,

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in the United States

### **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

### **Amazon Simple Email Service (Amazon)**

Amazon Simple Email Service is an email address management and message sending service provided by Amazon.com Inc.

Personal Data processed: email address.

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

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale in California
- a Sharing in California

### **OneSignal (Lilomi, Inc.)**

OneSignal is a message sending service provided by Lilomi, Inc.

OneSignal allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments. Depending on the permissions granted to this Application, the Data collected may also include precise location (i.e. GPS-level data) or WiFi information, apps installed and enabled on the User's device. This Application uses identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the OneSignal service.

**The Data collected may be used by the service provider for interest-based advertising, analytics and market research. In order to understand OneSignal's use of Data, consult [OneSignal's privacy policy](#).**

### **Push notifications opt-out**

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for some or all of the apps on the particular device.

### **Interest-based advertising opt-out**

Users may opt-out of OneSignal advertising features through applicable device settings, such as the device advertising settings for mobile phones. Different device configurations, or updates to devices, may affect or change how these indicated settings work.

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

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

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information; geolocation data; inferences drawn from other personal information.

This processing constitutes:

- a sale in California
- a Sharing in California

## **Platform services and hosting**

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

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

### **Google Play Store (Google LLC)**

This Application is distributed on the Google Play Store, a platform for the distribution of mobile apps, provided by Google LLC.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

## **Registration and authentication**

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

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

Facebook Authentication is a registration and authentication service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

### **Google OAuth (Google Inc.)**

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, 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: US – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in the United States

### **Login with Amazon (Amazon)**

Login with Amazon is a registration and authentication service provided by Amazon.com, Inc.

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

### **Remarketing and behavioral targeting**

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application 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.**

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

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Application with the Facebook advertising network.

Users can opt out of Facebook's use of Trackers for ads personalization by visiting this [opt-out page](#).

Personal Data processed: Cookies; email address.

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

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

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

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Application with the Facebook advertising network.

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

### **Google Ads Remarketing (Google Inc.)**

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

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

Personal Data processed: Cookies; Usage Data.

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California
- a Sharing in California

## **Social features**

### **Public profile (This Application)**

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

Personal Data processed: picture; username.

Category of Personal Information collected according to the CCPA: identifiers; audio, electronic, visual, thermal, olfactory, or similar information.

This processing constitutes:

### **Traffic optimization and distribution**

This type of service allows this Application 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 Application 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)**

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 this Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

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

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

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale in California

## **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**

### **Push notifications**

This Application may send push notifications to the User to achieve the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for this Application, some or all of the apps on the particular device. Users must be aware that disabling push notifications may negatively affect the utility of this Application.

### **Unique device identification**

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

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

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

## **Cookie Policy**

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

## **Further Information for Users in the European Union**

This section applies to all Users in the European Union, according to the General Data Protection Regulation (the "GDPR"), and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy. Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the Personal Data, if any, and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document.**

### **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.

## **Further information for Users in the United States**

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).



The information contained in this section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

## Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

*While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.*

### • Internet or other electronic network activity information

**Personal Information collected or disclosed:** Cookies, Usage data, Unique device identifiers for advertising (google advertiser id or idfa, for example), Trackers, Various types of data as specified in the privacy policy of the service, Tracker, Email address, Geographic position, Language, Device information, Geography/region, Number of users , Number of sessions, Session duration, In-app purchases, Application opens, Application updates, Launches, Operating systems, Universally unique identifier (uuid), Crash data, Purchase history

**Sensitive Personal Information collected or disclosed** ⓘ: payment info

#### Purposes:

- Advertising
- Advertising serving infrastructure
- Analytics
- Further information about Personal Data
- Handling payments
- Hosting and backend infrastructure
- Interaction with external social networks and platforms
- Registration and authentication
- Remarketing and behavioral targeting
- Traffic optimization and distribution
- Managing contacts and sending messages
- Infrastructure monitoring
- Platform services and hosting

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Jirbo, Inc., AdMob Google Inc., Amazon, AppLovin Corporation, SponsorPay GmbH, MoPub Inc., SupersonicAds Ltd., Unity Technologies ApS, Vungle, Inc., OpenX Technologies, Inc., Shift 6 Ltd, AppsFlyer Ltd, Facebook, Inc., Google Inc., Twitter, Inc., Apple Inc., Firebase, Inc., Cloudflare, Lilomi, Inc., Tapjoy, Inc., Google LLC, PubMatic, Inc., TripleLift, Inc., Mintegral International Limited, Lifftoff Mobile, Inc., Triapodi Ltd., Chartbeat, Chartboost, Inc., Dando online LTD

**Service providers or contractors:** This Application

### • Identifiers

**Personal Information collected or disclosed:** Cookies, Usage data, Unique device identifiers for advertising (google advertiser id or idfa, for example), Email address, First name, Last name, Picture, Tracker, Geographic position, Language, Various types of data as specified in the privacy policy of the service, Device information, Geography/region, Number of users , Number of sessions, Session duration, In-app purchases, Application opens, Application updates, Launches, Operating systems, Universally unique identifier (uuid), Crash data

**Sensitive Personal Information collected or disclosed** ⓘ: username

#### Purposes:

- Advertising
- Contacting the User

- Managing contacts and sending messages
- Remarketing and behavioral targeting
- Social features
- Analytics
- Infrastructure monitoring

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** AdMob Google Inc., Amazon, Facebook, Inc., Lilomi, Inc., Google LLC

**Service providers or contractors:** This Application

## • **Audio, electronic, visual, thermal, olfactory, or similar information**

**Personal Information collected or disclosed:** Picture

**Sensitive Personal Information collected or disclosed** ⓘ: username

**Purposes:**

- Social features

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Service providers or contractors:** This Application

## • **Geolocation data**

**Personal Information collected or disclosed:** Tracker, Usage data, Unique device identifiers for advertising (google advertiser id or idfa, for example), Email address, Geographic position, Language, Various types of data as specified in the privacy policy of the service, Device information, Geography/region, Number of users , Number of sessions, Session duration, In-app purchases, Application opens, Application updates, Launches, Operating systems

**Purposes:**

- Managing contacts and sending messages
- Analytics

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Lilomi, Inc., Google LLC

## • **Inferences drawn from other personal information**

**Personal Information collected or disclosed:** Tracker, Usage data, Unique device identifiers for advertising (google advertiser id or idfa, for example), Email address, Geographic position, Language, Various types of data as specified in the privacy policy of the service

**Purposes:**

- Managing contacts and sending messages

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Lilomi, Inc.

## • Commercial information

**Personal Information collected or disclosed:** Tracker, Usage data, Unique device identifiers for advertising (google advertiser id or idfa, for example), Device information, Geography/region, Number of users , Number of sessions, Session duration, In-app purchases, Application opens, Application updates, Launches, Operating systems, Purchase history

**Sensitive Personal Information collected or disclosed** ⓘ: payment info

### Purposes:

- Analytics
- Handling payments

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: Yes

**Third-parties:** Google LLC

ⓘ You can read the definitions of these concepts inside the “[Definitions and legal references section](#)” of the privacy policy.

**To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information (“Limit the Use of My Sensitive Personal Information”) you can refer to the “[Your privacy rights under US state laws](#)” section of our privacy policy.**

For more details on the collection of Personal Information, please read the section “[Detailed information on the processing of Personal Data](#)” of our privacy policy.

We won’t process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

## What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use this Application.

For example, you directly provide your Personal Information when you submit requests via any forms on this Application. You also provide Personal Information indirectly when you navigate this Application, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

## Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- **the right to request the deletion of your Personal Information.** You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.
- **the right to non-discrimination.**

## Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- **The right to opt out of the Sharing of your Personal Information** for cross-context behavioral advertising;
- **The right to request to limit our use or disclosure of your Sensitive Personal Information** to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

### **Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon and Montana**

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas and Oregon, you have

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- **The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

### **Additional rights for users residing in Utah**

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah, you have

- **The right to opt out of** the processing of your Personal Information for **Targeted Advertising**;
- **The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

### **How to exercise your privacy rights under US state laws**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

### **How to exercise your rights to opt out**

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on this Application.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request in a frictionless manner.

### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

## **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) / Personal Information (or Information)**

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.

### **Sensitive Personal Information**

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

### **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.

## **Sale**

Sale means any exchange of Personal Information by the Owner to a **third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

## **Sharing**

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioral advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

## **Targeted advertising**

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

## **European Union (or EU)**

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

## **Cookie**

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

## **Tracker**

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

## **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

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

Latest update: May 29, 2024