

# Cookie Policy of Transfeero

To find more information on California consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Virginia consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Colorado consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Connecticut consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Utah consumers and their privacy rights, Users may [read the privacy policy](#).

This document informs Users about the technologies that help Transfeero to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with Transfeero.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Transfeero uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

## Activities strictly necessary for the operation of Transfeero and delivery of the Service

Transfeero uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

### First-party Trackers

#### Registration and authentication provided directly by Transfeero

By registering or authenticating, Users allow Transfeero 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 (Transfeero)

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

Personal Data processed: address, billing address, city, company name, Cookies, country, county, date of birth, email address, field of activity, first name, gender, house number, language, last name, number of employees, password, phone number, picture, prefix, profession, Social Security number (SSN), state, Tax ID, Usage Data, User ID, username, various types of Data, VAT Number, website, workplace and ZIP/Postal code.

### Third-party Trackers

#### SPAM protection

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

#### Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC. The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

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

Personal Data processed: Cookies and Usage Data.

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

Storage duration:

- `_GRECAPTCHA`: duration of the session
- `rc::a`: indefinite
- `rc::b`: duration of the session
- `rc::c`: duration of the session

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

Cloudflare Bot Management is a malicious bot protection and management service provided by Cloudflare, Inc.

Personal Data processed: app information, Application opens, browser information, browsing history, city, clicks, country, county, custom events, device information, device logs, geography/region, interaction events, IP address, keypress events, language, latitude (of city), launches, longitude (of city), metro area, motion sensor events, mouse movements, number of sessions, operating systems, page events, page views, province, scroll position, scroll-to-page interactions, search history, session duration, session statistics, state, touch events, Trackers, Usage Data, video views and ZIP/Postal code.

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

Storage duration:

- `__cf_bm`: 3 seconds
- `__cfuid`: duration of the session
- `cf_ob_info`: 3 seconds
- `cf_use_ob`: 3 seconds
- `cfmrk_cic`: 3 months

### **Traffic optimization and distribution**

This type of service allows Transfeero 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 Transfeero 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 Transfeero, i.e., communication between Transfeero and the User's browser, while also allowing analytical data from Transfeero to be collected.

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

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

### **Handling payments**

Unless otherwise specified, Transfeero 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. Transfeero 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.

### **Payments processed via the Apple App Store (Apple Inc.)**

Transfeero uses a payment service provided by Apple Inc. 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 Apple, as described in the [privacy policy for the App Store](#).

Personal Data processed: billing address, device information, email address, first name, last name, phone number, purchase history, Trackers and Usage Data.

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

## **Other activities involving the use of Trackers**

### **Functionality**

Transfeero uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

### **Contacting the User**

#### **Mailing list or newsletter (Transfeero)**

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

Personal Data processed: city, Cookies, country, email address, first name, gender, last name, state and Usage Data.

### **Experience**

Transfeero uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

### **Displaying content from external platforms**

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

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

#### **Google Maps widget (Google Ireland Limited)**

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

Personal Data processed: Trackers and Usage Data.

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

#### **Google Programmable Search Engine (Google Ireland Limited)**

Google Programmable Search Engine is a search engine embedding service provided by Google Ireland Limited that allows Transfeero to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

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

### **Measurement**

Transfeero uses Trackers to measure traffic and analyse User behaviour to improve the Service.

### **Analytics**

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

#### **Google Analytics (Universal Analytics)**

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 Transfeero, 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 and Usage Data.

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

Storage duration:

- AMP\_TOKEN: 1 hour
- \_ga: 2 years
- \_gac\*: 3 months
- \_gat: 1 minute
- \_gid: 1 day

#### **Google Analytics for Firebase (Google Ireland Limited)**

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

**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.

Transfeero 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, Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and Usage Data.

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

#### **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 Transfeero, 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: browser information, city, device information, latitude (of city), longitude (of city), number of Users, session statistics, Trackers and Usage Data.

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

Storage duration:

- \_ga: 2 years
- \_ga\_\*: 2 years

#### **Google Analytics Demographics and Interests reports (Google Ireland Limited)**

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for Transfeero (demographics means age and gender Data).

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

Personal Data processed: Trackers and unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

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

Storage duration:

- IDE: 2 years
- \_gcl\_\*: 3 months
- test\_cookie: 15 minutes

### **Analytics services managed directly by Transfeero**

The services contained in this section allow the Owner to collect and manage analytics through the use of first-party Trackers.

#### **Analytics collected directly (Transfeero)**

Transfeero uses an internal analytics system that does not involve third parties.

Personal Data processed: Trackers and Usage Data.

Storage duration:

- modernizr: indefinite

### **Anonymized analytics services**

The services contained in this section allow the Owner, through the use of third-party Trackers, to collect and manage analytics in an anonymized form.

#### **Google Analytics (Universal Analytics) with anonymized IP (Google Ireland Limited)**

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of Transfeero, 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.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

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

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- AMP\_TOKEN: 1 hour
- \_ga: 2 years
- \_gac\*: 3 months
- \_gat: 1 minute
- \_gid: 1 day

### **Content performance and features testing (A/B testing)**

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of Transfeero.

#### **Google Optimize (Google Ireland Limited)**

Google Optimize is an A/B testing service provided by Google Ireland Limited ("Google").

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

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- \_gaexp: 3 months
- \_opt\_awcid: 1 day

- \_opt\_awgid: 1 day
- \_opt\_awkid: 1 day
- \_opt\_awmid: 1 day
- \_opt\_expid: 10 seconds
- \_opt\_utm: 1 day

## Marketing

Transfeero uses Trackers to deliver personalised marketing content based on User behaviour and to operate, serve and track ads.

## 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 Transfeero, 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 for identifying Users, behavioral retargeting i.e. displaying ads tailored to the User's interests and behavior, or to measure ads performance. 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.

### Google Ads conversion tracking

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 Transfeero.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- IDE: 2 years
- test\_cookie: 15 minutes

### Microsoft Advertising (Microsoft Corporation)

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- MUID: 2 years
- \_uetmsclkid: 3 months
- \_uetmsclkid: indefinite
- \_uetsid: 1 day
- \_uetsid: indefinite
- \_uetvid: 2 years
- \_uetvid: indefinite

### Google Ads Similar audiences (Google Ireland Limited)

Similar audiences is an advertising and behavioral targeting service provided by Google Ireland Limited that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of Transfeero.

On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google [Ad Settings](#).

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

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- GCL\_AW\_P: 3 months
- GED\_PLAYLIST\_ACTIVITY: duration of the session
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- \_\_gads: 2 years
- \_\_gpi: 2 years
- \_\_gpi\_optout: 2 years
- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_ag: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- \_gcl\_gs: 3 months
- \_gcl\_ha: 3 months
- id: 2 years
- receive-cookie-deprecation: 6 months
- test\_cookie: 15 minutes

#### Google Ad Manager

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with.

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

This service uses the “DoubleClick” Cookie, which tracks use of Transfeero and User behavior concerning ads, products and services offered.

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

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- GCL\_AW\_P: 3 months
- GED\_PLAYLIST\_ACTIVITY: duration of the session
- IDE: 2 years
- NID: 6 months

- RUL: 1 year
- TAID: 14 days
- \_\_gads: 2 years
- \_\_gpi: 2 years
- \_\_gpi\_optout: 2 years
- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_ag: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- \_gcl\_gs: 3 months
- \_gcl\_ha: 3 months
- id: 2 years
- receive-cookie-deprecation: 6 months
- test\_cookie: 15 minutes

#### **Google Ads Customer Match**

Google Ads Customer Match is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows matching Data that Users have shared with the Owner to existing Google accounts in order to target them or similar Users with personalized ads.

Users can opt out of Google's use of personalized advertising by visiting Google's [Ads Settings](#).

Personal Data processed: country, email address, first name, last name, phone number, Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), User ID and ZIP/Postal code.

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

#### **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.

#### **Mailchimp (The Rocket Science Group LLC)**

Mailchimp is an email address management and message sending service provided by The Rocket Science Group LLC.

Personal Data processed: address, company name, Cookies, country, date of birth, email address, first name, gender, last name, phone number, Usage Data, username and various types of Data.

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

#### **Remarketing and behavioral targeting**

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

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

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

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

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

#### **Google Ad Manager Audience Extension**

Google Ad Manager Audience Extension 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 tracks the visitors of Transfeero and allows selected advertising partners to display targeted ads across the web to them.



Personal Data processed: Cookies and Usage Data.

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

Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- GCL\_AW\_P: 3 months
- GED\_PLAYLIST\_ACTIVITY: duration of the session
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- \_\_gads: 2 years
- \_\_gpi: 2 years
- \_\_gpi\_optout: 2 years
- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_ag: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- \_gcl\_gs: 3 months
- \_gcl\_ha: 3 months
- id: 2 years
- receive-cookie-deprecation: 6 months
- test\_cookie: 15 minutes

#### Remarketing with Google Analytics

Remarketing with Google Analytics 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 tracking activity performed by Google Analytics and its Cookies with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Cookies and Usage Data.

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

Storage duration:

- test\_cookie: 15 minutes
- IDE: 2 years
- \_gcl\_\*: 3 months

#### Google Ads Remarketing

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 Transfeero with the Google Ads advertising network and the DoubleClick Cookie.

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

Personal Data processed: Cookies and Usage Data.

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

Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- GCL\_AW\_P: 3 months
- GED\_PLAYLIST\_ACTIVITY: duration of the session
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- \_\_gads: 2 years
- \_\_gpi: 2 years
- \_\_gpi\_optout: 2 years
- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_ag: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- \_gcl\_gs: 3 months
- \_gcl\_ha: 3 months
- id: 2 years
- receive-cookie-deprecation: 6 months
- test\_cookie: 15 minutes

#### **Google Signals (Google Ireland Limited)**

Transfeero uses Google Signals, a feature of Google Analytics, which will associate the visitation information that it collects from Transfeero with Google information from accounts of signed-in Google-account users who have consented to this association for the purpose of ads personalization. This Google information may include User location, search history, YouTube history and Data from sites that partner with Google – and is used to provide aggregated and anonymized insights into Users' cross device behaviors.

If a User falls under the described association, they [may access and/or delete such Data via My Activity](#) provided by Google.

Personal Data processed: Trackers and Usage Data.

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

### **How to manage preferences on Transfeero**

Users can set or update their preferences via the relevant privacy choices panel available on Transfeero.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

### **How to control or delete Cookies and similar technologies via your device settings**

Users may use their own browser settings to:

- See what Cookies or other similar technologies have been set on the device;
- Block Cookies or similar technologies;
- Clear Cookies or similar technologies from the browser.

The browser settings, however, do not allow granular control of consent by category.

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#)
- [Microsoft Internet Explorer](#)
- [Microsoft Edge](#)
- [Brave](#)
- [Opera](#)

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

### **How to opt out of interest-based advertising**

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

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

### **Consequences of denying the use of Trackers**

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help Transfeero to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

### **Owner and Data Controller**

Sicily Action SRL  
Via Fiuggi sn  
95037, San Giovanni La Punta (CT)  
Tel. +39 0958998743  
VAT: IT05304190878  
REA: CT-357256

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

Since the use of third-party Trackers through Transfeero cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by Transfeero.

### **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 Transfeero (or third-party services employed in Transfeero), which can include: the IP addresses or domain names of the computers utilized by the Users who use Transfeero, 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 Transfeero 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 Transfeero. The Data Controller, unless otherwise specified, is the Owner of Transfeero.

**Transfeero (or this Application)**

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

**Service**

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

**European Union (or EU)**

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

**Cookie**

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

**Tracker**

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

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**Legal information**

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

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

Latest update: May 01, 2024