

Your future in Spanish!



Our Privacy and Cookie Policy

Privacy Notice

This privacy notice explains the information used by *Glhee Spanish School* and our website: www.glhee.com

For further information read our *Data Protection Policy* and *Policy on your Rights in Relation to your Data*.

This privacy notice only refers to information collected by *Glhee Spanish School*

This notice describes:

- What personally identifiable information is collected from you through our forms, communications and website,
- What choices are available to you regarding the use of your data,
- The security procedures in place to protect the misuse of your information,
- How you can correct any inaccuracies in the information,
- Information Collection, Use, and Sharing.

We are the sole owners of the information collected on our website.

We only have access to information that you voluntarily give us via email

through our online forms or other direct contact from you. We will not sell or rent this information to anyone. We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfil your request.

Your access to and control over Information

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via info@glhee.com:

- See what data we have about you;
- Change/correct any data we have about you;
- Ask us to delete any data we have about you;
- Express any concern you have about our use of your data.

Security

We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline.

While we protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job are granted access to personally identifiable information. The computers/files in which we store personally identifiable information are kept in a secure environment.

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If you feel that we are not abiding by this privacy policy, you should contact us immediately via: info@glhee.com

What student information do we collect and why do we use it?

- We need to collect information from you when you book an Spanish course with us.
- You will be asked for your name, nationality, date of birth, contact details and medical emergency contacts.
- You may also be asked for your passport or visa details if required, and specific medical and dietary information regarding your accommodation or study needs.
- During school activities, photographs may be taken of students. School photos may be used on our managed social media pages and marketing materials.
- All your personal information and photos will be kept securely and only used:
 - to enroll you in our school,
 - to process transactions,
 - to help with visa applications,
 - to book accommodation,
 - to officially promote Glhee Spanish School

Glhee Spanish School requires permission to use this information or any photographs taken of you. You may request this data at any time or tell us to remove it from our school records unless it is kept for legal reasons.

We will ask you if you accept this privacy policy on our booking form. This can be withdrawn at any time.

If you have any questions, please contact us:

Glhee Spanish School
Cra 7 # 116-50 Wework Usaquen

Bogotá, Colombia

+57 301.203.1427

info@glhee.com

Data Protection Statement

What do we use your information for?

- Any of the information we collect from you may be used in one of the following ways:
- To personalize your experience (your information helps us to better respond to your individual needs).
- To improve our school (we continually strive to improve our language programmes based on the information and feedback we receive from you).
- To complete financial transactions.
- Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of enrolling you on one of our language programmes, personalise your experience (course, social programme, accommodation) or

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officially promoting Glhee Spanish School

- To administer our health & safety records.
- To reply to emails.
- To be able to act appropriately in cases of emergencies.

Your personal data – what is it?

- Personal data is information which can be used to identify you.
- Identification can occur because of data controlled by Glhee Spanish School
- The processing of personal data is governed by the General Data Protection Regulations, GDPR.

Glhee Spanish School may collect and store:

Date of birth; contact details; nationality; gender; emergency phone number; payment information; passport and visa details (if required); medical conditions, special educational needs, allergies, and any requirements you state; test and examination results, school photos and videos.

Who are we?

Glhee Spanish School is the data controller. This means Glhee Spanish School decides how and why your personal data is used and kept.

How do we process your personal data?

Glhee Spanish School complies with

GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use and share your personal data for the following purposes:

- To provide our booking team with relevant information to successfully enroll students on our language programmes and accommodation options.
- To help our academic team and teachers place students in a class at the correct level.
- To process financial transactions and operate the language school.
- To maintain our student, employee, agent and host family files.
- To maintain our health and safety records.
- To maintain our own financial accounts and academic records.
- To meet our accreditation requirements.
- To assist non-EEA students in applying for a student visas in Ireland.
- To assist in opening Colombian bank accounts where applicable.
- To order medical insurances where requested and required.
- To maintain attendance records for immigration services.
- To promote the school and communicate with students regarding events and news.
- To enrol students in Spanish language examinations.

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What is the legal basis for processing your personal data?

These fall under either article 6 or article 9 – dealt with separately below:

Article 6 of GDPR- Lawfulness of processing

- With the consent of the data subject
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract (see terms and conditions)
- Processing is necessary for compliance with a legal obligation (financial records are kept to meet our legal tax obligations, student records are kept for our accreditation requirements and immigration authorities)
- Processing is necessary to protect the vital interests of the data subject or another person (health and safety obligations)
- Processing is necessary for the legitimate interests of the data controller except where such interests are overridden by the interests, rights or freedoms of the data subject (to promote the language school and communicate information to students)

Article 9 of GDPR- Processing of special categories of personal data

- Explicit consent of the data subject

- Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity (visa applications and visa requirements for non-COLOMBIAN students)
- Processing is necessary for reasons of substantial public interest on the basis of COLOMBIAN or Member State law (health and safety records, visa applications and visa requirements for non-COLOMBIAN students)
- Processing is necessary for the smooth operation of any student insurance policies
- Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes (enrolment information)

Sharing your personal data

Your personal data will be treated in the strictest confidence and will only be shared with relevant staff of Atlas Language School, to meet its legal requirements or, where applicable, with trusted partner organisations providing services such as social programme activities, medical care, insurance cover, visa application support, bank account opening, or immigration services. We will only share your data with other third parties with your express consent.

How long do we keep your personal data?

In order to meet our operational obligations there is no time limit on

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how long we keep your personal data, unless you request your data to be removed from our system.

Your rights and your personal data

Unless subject to an exemption under GDPR you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which Glhee Spanish School holds about you;
- The right to request that Glhee Spanish School corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Glhee Spanish School to retain such data;
- The right to withdraw your consent to data processing at any time;
- The right to request that the data controller provides the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable), unless required for legitimate or legal reasons;
- The right to lodge a complaint with the Data Protection Commissioner.

Transfer of Data Abroad

Your personal data may only to be transferred to countries or territories outside the COLOMBIAN with your express consent if required.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact Jasbleidy Cobos (Managing Director) at:

Glhee Spanish School
Cra 7 # 116-50 Wework Usaquen

Bogotá, Colombia

+57 301.203.1427

info@glhee.com

For information about the data that we collect when you **visit and engage with our website**(www.glhee.com), and about how this data may be used, please read our **Privacy and Cookie Policy** below:

Privacy and Cookie Policy

Privacy Policy of www.glhee.com

This Website collects some Personal Data from its Users.

Owner and Data Controller

Jasbleidy Cobos
Glhee Spanish School
Cra 7 # 116-50 Wework Usaquen

Bogotá, Colombia

+57 301.203.1427
info@glhee.com

Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Cookies, first name, last name, country, email address, Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and phone number.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party

services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the

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processing of Personal Data is subject to European data protection law;

- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of

this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Traffic optimization and distribution, Contacting the User, Analytics, Advertising, Remarketing and behavioral targeting, Interaction with external social networks and platforms, Displaying content from external platforms, SPAM

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protection, User database management, Managing contacts and sending messages, Interaction with live chat platforms, Interaction with online survey platforms, Platform services and hosting and Registration and authentication.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

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 displayed in the form of banners and other advertisements on this Website, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Cookies 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 Website. For more information, please check the privacy policies of the relevant services.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

Facebook Audience Network (Facebook, Inc.)

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

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

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

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

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

- **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.

Facebook Ads conversion tracking (Facebook, Inc.)

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

Personal Data collected: Cookies and Usage Data.

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

Facebook Analytics for Apps (Facebook, Inc.)

Facebook Analytics for Apps is an analytics service provided by Facebook, Inc.

Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service.

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

Google Ads conversion tracking (Google Inc.)

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

Personal Data collected: Cookies and Usage Data.

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

Google Analytics (Google Inc.)

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

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

Personal Data collected: Cookies and Usage Data.

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

Google Tag Manager (Google Inc.)

Google Tag Manager is an analytics service provided by Google Inc.

Personal Data collected: Cookies and Usage Data.

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

HubSpot Analytics (HubSpot, Inc.)

HubSpot Analytics is an analytics service provided by HubSpot, Inc.

Personal Data collected: Cookies and Usage Data.

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

Wordpress Stats (Automattic Inc.)

Wordpress Stats is an analytics service provided by Automattic Inc.

Personal Data collected: Cookies and Usage Data.

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

- **Contacting the User**

Contact form (this Website)

By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form’s header.

Personal Data collected: country, email address, first name and last name.

- **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Maps widget (Google Inc.)

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

Personal Data collected: Cookies and Usage Data.

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

Instagram widget (Instagram, Inc.)

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

Personal Data collected: Cookies and Usage Data.

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

YouTube video widget (Google Inc.)

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

Personal Data collected: Cookies and Usage Data.

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

- **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 Website.

The interaction and information obtained

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through this Website 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.

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 Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

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

Twitter Tweet button and social widgets (Twitter, Inc.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data collected: Cookies and Usage Data.

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

YouTube button and social widgets (Google Inc.)

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google Inc.

Personal Data collected: Usage Data.

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

Pinterest "Pin it" button and social widgets (Pinterest)

The Pinterest "Pin it" button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data collected: Cookies and Usage Data.

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

Google+ +1 button and social widgets (Google Inc.)

The Google+ +1 button and social widgets are services allowing interaction with the Google+ social network provided by Google Inc.

Personal Data collected: Cookies and Usage Data.

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

• **Interaction with live chat platforms**

This type of service allows Users to interact with third party live chat platforms directly from the pages of this Website, for contacting and being contacted by this Website support service.

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

LiveChat Widget (LiveChat, Inc.)

The LiveChat Widget is a service for interacting with the LiveChat live chat platform provided by LiveChat, Inc.

Personal Data collected: Cookies and Usage Data.

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

• **Interaction with online survey platforms**

This type of service allows Users to interact with third party online survey platforms directly from the pages of this Website.

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

SurveyMonkey Widget (SurveyMonkey Inc.)

The SurveyMonkey Widget is a service for interacting with the SurveyMonkey online survey platform provided by SurveyMonkey Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [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

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interacted with it, such as by clicking on links included in the message.

HubSpot Email (HubSpot, Inc.)

HubSpot Email is an email address management and message sending service provided by HubSpot, Inc.

Personal Data collected: email address and Usage Data.

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

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 collected: email address.

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

- **Platform services and hosting**

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

WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to build, run and host this Website.

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

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

- **Registration and authentication**

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and

authentication services. In this case, this

Website will be able to access some Data, stored by these third party services, for registration or identification purposes.

WordPress.com Single Sign On (Automattic Inc.)

WordPress.com Single Sign On is a registration and authentication service provided by Automattic Inc. and is connected to the WordPress.com network.

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

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

- **Remarketing and behavioral targeting**

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

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

Facebook Custom Audience (Facebook, Inc.)

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

Personal Data collected: Cookies and email address.

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

Facebook Remarketing (Facebook, Inc.)

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

Personal Data collected: Cookies and Usage Data.

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

Remarketing through Google Analytics for Display Advertising (Google Inc.)

Google Analytics for Display Advertising is a remarketing and behavioral targeting service provided by Google Inc. that connects the tracking activity performed by Google Analytics and its Cookies with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage Data.

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

- **SPAM protection**

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

Google reCAPTCHA (Google Inc.)

Google reCAPTCHA is a SPAM protection service provided by Google Inc.

The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

Personal Data collected: Cookies and Usage Data.

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

Akismet (Automattic Inc.)

Akismet is a SPAM protection service provided by Automattic Inc.

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

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

- **Traffic optimization and distribution**

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

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter

communications between this Website and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information 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 Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

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

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

- **User database management**

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Website, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Website.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Website.

HubSpot CRM (HubSpot, Inc.)

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data collected: email address, phone number and various types of Data as specified in the privacy policy of the service.

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

HubSpot Lead Management (HubSpot, Inc.)

HubSpot Lead Management is a User database management service provided by HubSpot, Inc.

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

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

The rights of Users

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

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible,

to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.

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

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Cookie Policy

This Website uses Cookies. To learn more and for a detailed cookie notice, the User may consult the [Cookie Policy](#).

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages

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leading to possible legal action arising from improper use of this Website or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

This Website does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent,

the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

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

Usage Data

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

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The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

This Website (or this Application)

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

Service

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

Cookies

Small piece of data stored in the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

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