

Privacy Policy

This application collects some personal data from its users.

Owner contact email: support@belotto.io

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) and email address.

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.

The personal data may be freely provided by the user, or, in case of usage data, collected automatically when using this application.

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 any consequences on 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, if available.

Users are responsible for any third-party personal data obtained, published or shared through this application 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 data controller processes the data of users in a proper manner and shall take 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 data controller, in some cases, the data may be accessible to certain types of persons in charge, involved with the operation of the site (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 Data Controller at any time.

Place

The data is processed at the data controller's operating offices and in any other places where the parties involved in the processing are located. For further information, please contact the Data Controller.

Retention time

The data is kept for the time necessary to provide the service requested by the user, or stated by the purposes outlined in this document, and the user can always request that the Data Controller suspend or remove the data, except for information stored on the Blockchain.

The use of the collected Data

The data concerning the user is collected to allow the owner to provide its services, as well as for the following purposes: remarketing and behavioral targeting, analytics, advertising, registration and authentication, interaction with external social networks and platforms, content commenting, access to third-party accounts, managing support and contact requests and interaction with support and feedback platforms.

The personal data used for each purpose is outlined in the specific 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:

Access to third party accounts

This type of service allows this Application to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

Twitter account access (Twitter, Inc.)

This service allows this Application to connect with the User's account on the Twitter social network, provided by Twitter, Inc.

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

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

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 Application, possibly based on User interests.

This does not mean that all Personal Data is 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 Application. 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](#).

Bing Ads (Microsoft Corporation)

Bing Ads is an advertising service provided by Microsoft Corporation.

Personal Data collected: Cookies and Usage Data.

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

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

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 (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 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.

Personal Data collected: Cookies and Usage Data.

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

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 Application.

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](#)

Twitter Ads conversion tracking (Twitter, Inc.)

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

Personal Data collected: Cookies and Usage Data.

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

Content commenting

Content commenting services allow Users to make and publish their comments on the contents of this Application.

Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

Facebook Comments (Facebook, Inc.)

Facebook Comments is a content commenting service provided by Facebook, Inc. enabling the User to leave comments and share them on the Facebook platform.

Personal Data collected: Cookies and Usage Data.

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.

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.

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.

LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data collected: Cookies and Usage Data.

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

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.

Facebook Authentication (Facebook, Inc.)

Facebook Authentication is a registration and authentication service provided by Facebook, Inc. and is connected to the Facebook social network.

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

Linkedin OAuth (LinkedIn Corporation)

Linkedin OAuth is a registration and authentication service provided by LinkedIn Corporation and is connected to the LinkedIn social network.

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

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

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Data Controller, 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 Data Controller 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 for this purpose other Personal Data (such as IP Address).

Information not contained in this policy

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

The rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their

transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application 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 Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

Information about this privacy policy

The Data Controller is responsible for this privacy policy, prepared starting from the modules provided by lubenda and hosted on lubenda's servers.

Definitions and legal references

Personal Data (or Data)

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

Usage Data

Information collected automatically from 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, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

Data Subject

The legal or natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

Data Controller (or Owner)

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, 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 hardware or software tool by which the Personal Data of the User is collected.

This privacy policy relates solely to this Application.

Latest update: March 22, 2018