

# Privacy Policy of SAPI

SAPI collects some Personal Data from its Users.

## Owner and Data Controller

SAPI Group Limited, Senna Building, Gorsuch Place, London, E2 8JF, United Kingdom

**Owner contact email:** legal@sapi.com

## Types of Data collected

Among the types of Personal Data that SAPI collects, by itself or through third parties, there are: Tracker; Usage Data; first name; last name; email address; username; device information; Data communicated while using the service; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); company name; country; city; date of birth; gender; geographic position; language; phone number; password; picture; profession; screenshots; ZIP/Postal code; VAT Number; workplace; physical address; fax number; state; county; various types of Data; Tax ID; field of activity; User ID; number of employees; website; Camera permission; Precise location permission (continuous); Precise location permission (non-continuous); Call permission; profile picture; Universally unique identifier (UUID); Twitter handle; billing address; house number; marital status; payment info.

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 SAPI.

Unless specified otherwise, all Data requested by SAPI is mandatory and failure to provide this Data may make it impossible for SAPI to provide its services. In cases where SAPI 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 SAPI or by the owners of third-party services used by SAPI serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

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

## 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 SAPI (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

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

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

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Access to third-party accounts, Analytics, Displaying content from external platforms, Advertising, Remarketing and behavioral targeting, Beta Testing, Connecting Data, Contacting the User, Content commenting, Data transfer outside the EU, Device permissions for Personal Data access, Handling payments, Registration and authentication, Handling activity data, Handling activities related to productivity, Hosting and backend infrastructure, User database management, Location-based interactions, Managing contacts and sending messages, Platform services and hosting, Registration and authentication provided directly by SAPI, Social features, Tag Management, Interaction with external social networks and platforms, Managing data collection and online surveys, Handling compliance and Information collection.

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

## **Device permissions for Personal Data access**

Depending on the User's specific device, SAPI may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document. The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of SAPI.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by SAPI.

### **Call permission**

Used for accessing a host of typical features associated with telephony.

### **Camera permission**

Used for accessing the camera or capturing images and video from the device.

### **Precise location permission (continuous)**

Used for accessing the User's precise device location. SAPI may collect, use, and share User location Data in order to provide location-based services.

### **Precise location permission (non-continuous)**

Used for accessing the User's precise device location. SAPI may collect, use, and share User location Data in order to provide location-based services.

The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for SAPI to derive the exact position of the User on a continuous basis.

## **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 SAPI 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.

#### **Stripe account access (Stripe Inc)**

This service allows SAPI to connect with the User's account on Stripe, provided by Stripe, Inc.

Personal Data processed: Data communicated while using the service; device information; email address; first name; last name; Tracker; Usage Data; username.

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

## 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 SAPI, 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 Ireland Limited)**

Google Ads conversion tracking is an analytics service provided by Google Ireland Limited that connects data from the Google Ads advertising network with actions performed on SAPI.

Personal Data processed: Trackers; Usage Data.

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

### **Meta Audience Network (Facebook Ireland Ltd)**

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

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

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

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

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

### **Facebook Lookalike Audience (Facebook Ireland Ltd)**

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Facebook Ireland Ltd that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of SAPI or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

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

Personal Data processed: Tracker; Usage Data.

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

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

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

Personal Data processed: Trackers; Usage Data.

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

### **LinkedIn conversion tracking (LinkedIn Insight Tag) (LinkedIn Corporation)**

LinkedIn conversion tracking (LinkedIn Insight Tag) is an analytics and behavioral targeting service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on SAPI. The LinkedIn Insight Tag

tracks conversions that can be attributed to LinkedIn ads and enables to target groups of Users on the base of their past use of SAPI.

Users may opt out of behavioral targeting features through their device settings, [their LinkedIn account settings](#) or by visiting the [AdChoices opt-out page](#).

Personal Data processed: device information; Trackers; Usage Data.

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

### **1plusX (1plusX AG)**

1plusX is an advertising service provided by 1plusX AG.

Personal Data processed: Tracker; Usage Data.

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

## **Analytics**

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

### **Google Analytics (Universal Analytics) (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 SAPI, 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: Tracker; Usage Data.

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

### **Analytics collected directly (SAPI)**

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

Personal Data processed: Tracker; Usage Data.

### **Google Analytics Advertising Reporting Features (Google Ireland Limited)**

Google Analytics on SAPI has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

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

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

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

### **Facebook Analytics for Apps (Facebook Ireland Ltd)**

Facebook Analytics for Apps is an analytics service provided by Facebook Ireland Ltd

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

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

### **Wordpress Stats**

Wordpress Stats is an analytics service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing.

Personal Data processed: Tracker; Usage Data.

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

### **FullStory (FullStory, Inc.)**

FullStory is an analytics and heat mapping service provided by FullStory, Inc. FullStory maps how frequently Users interact with the different areas of SAPI, allowing the Owner to draw conclusions about their interests and preferences. FullStory further allows for the recording of mapping sessions making them available for later visual playback.

Personal Data processed: Trackers; Usage Data.

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

### **Beta Testing**

This type of service makes it possible to manage User access to SAPI, or parts of it, for the purpose of testing a certain feature or the entire Application.

The service provider may automatically collect data related to crashes and statistics related to the User's use of SAPI in a personally identifiable form.

### **App Center (Microsoft Corporation)**

App Center is a beta testing service provided by Microsoft Corporation. SAPI may also send push notifications to the User.

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

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

### **Connecting Data**

This type of service allows the Owner to connect Data with third-party services disclosed within this privacy policy. This results in Data flowing through these services, potentially causing the retention of this Data.

### **Zapier (Zapier, Inc.)**

Zapier is a workflow automation service provided by Zapier, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; language; last name; password; phone number; picture; profession; screenshots; Tracker; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

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

### **Contacting the User**

#### **Contact form (SAPI)**

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

Personal Data processed: city; company name; country; county; date of birth; email address; fax number; field of activity; first name; gender; last name; number of employees; phone number; physical address; profession; state; Tax ID; User ID; various types of Data; VAT Number; website; ZIP/Postal code.

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

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

Personal Data processed: city; company name; country; county; date of birth; email address; first name; gender; last name; phone number; physical address; profession; state; Tracker; Usage Data; website; ZIP/Postal code.

## **Phone contact (SAPI)**

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

Personal Data processed: phone number.

## **Content commenting**

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

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.

## **Comment system managed directly (SAPI)**

SAPI has its own internal content comment system.

Personal Data processed: email address; first name; last name; phone number; Tracker; Usage Data; username; website.

## **Device permissions for Personal Data access**

SAPI requests certain permissions from Users that allow it to access the User's device Data as described below.

### **Device permissions for Personal Data access (SAPI)**

SAPI requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Call permission; Camera permission; Precise location permission (continuous); Precise location permission (non-continuous).

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of SAPI 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 Fonts (Google Ireland Limited)**

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

Personal Data processed: Tracker; Usage Data.

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

### **Font Awesome (Fonticons, Inc. )**

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows SAPI to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

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

### **Gravatar**

Gravatar is an image visualization service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows SAPI to incorporate content of this kind on its pages.

Please note that if Gravatar images are used for comment forms, the commenter's email address or parts of it may be sent to Gravatar - even if the commenter has not signed up for that service.

Personal Data processed: email address; Usage Data.

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

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

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

Personal Data processed: Tracker; Usage Data.

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

### **Handling activities related to productivity**

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

#### **Airtable (Formagrid, Inc.)**

Airtable is an online spreadsheet and collaboration service provided by Formagrid, Inc.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; password; phone number; physical address; profession; profile picture; screenshots; Tracker; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

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

#### **Google Workspace**

Google Workspace is an integrated suite of cloud-based productivity, collaboration and storage services provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. Gmail or other G Suite services are not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside these services for advertising purposes in any other way.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; password; phone number; physical address; profession; profile picture; screenshots; Tracker; Usage Data; username; VAT Number; workplace.

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

#### **Notion (Notion Labs, Inc. )**

Notion is an online text-editing and collaboration service provided by Notion Labs, Inc. .

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; password; phone number; physical address; profession; profile picture; screenshots; Tracker; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

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

### **Handling activity data**

This type of service allows the Owner to use the activity data collected by your device in order for SAPI to operate or to provide specific features. This may include movements, heartbeat, change in altitude or data about the surroundings. Depending on what is described below, third parties may be involved in the activity tracking. Most devices allow for the User to control which Data is accessed or stored.

#### **Activity data tracked by your device (SAPI)**

SAPI uses some activity data tracked by your device to operate or to provide specific features.

Personal Data processed: date of birth; gender.

### **Handling compliance**

## **CIFAS**

SAPI partners with CIFAS to enhance fraud prevention measures and ensure the security and trustworthiness of financial transactions for its customers.

By utilising CIFAS services, SAPI can detect and prevent fraudulent activities. Personal information provided by Users will be shared with CIFAS for identity verification and fraud prevention purposes. In cases where fraud is detected, Users may be denied employment, finance and certain services, including funding.

For more information on how your data will be used by SAPI and CIFAS, as well as details on your data protection rights, please visit <https://www.cifas.org.uk/fpn>.

## **Onfido**

Onfido KYC Service is an identity verification service provided by Onfido Ltd. that uses personal data and identity documents provided by Users to verify their identity. This service is used as part of our onboarding process to ensure the identity of individuals engaging with our services.

Onfido collects and processes information such as document images, facial biometrics, and other personal data to perform identity verification checks. This data is securely transmitted and handled in accordance with Onfido's privacy practices and applicable regulations.

Users have the right to access, rectify, or delete their personal data collected and processed by Onfido. For more information or to exercise these rights, please visit Onfido's privacy policy or contact their support team.

Personal Data processed: Identity document images; facial biometrics; Usage Data; contact information.

## **Griffin (Griffin Bank Ltd.)**

Griffin Verify is an automated onboarding solution that allows businesses to perform comprehensive Know Your Customer (KYC) and Know Your Business (KYB) checks through a single API integration. This includes identity verification, anti-money laundering (AML) screening, and anti-fraud checks.

Personal Data processed: Identity document images; business registration information; AML and fraud screening data; contact information.

<https://griffin.com/privacy>

## **ComplyAdvantage (ComplyAdvantage Ltd.)**

ComplyAdvantage (ComplyAdvantage Ltd.)

ComplyAdvantage is a RegTech company that provides software solutions to detect and manage risks related to Anti-Money Laundering (AML) and fraud. Using artificial intelligence, machine learning, and natural language processing, ComplyAdvantage helps organizations fulfill regulatory obligations and counteract financial crime.

Personal Data processed: AML screening data; transaction monitoring information; risk assessment data; contact information.

## **Handling payments**

Unless otherwise specified, SAPI 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. SAPI 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.

## **Stripe (Stripe Inc)**

Stripe is a payment service provided by Stripe Inc.

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

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

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

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

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



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

### **Google Pay (Google Ireland Limited)**

Google Pay is a payment service provided by Google Ireland Limited, which allows users to make online payments using their Google credentials.

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

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

### **GoCardless (GoCardless Limited)**

GoCardless is a payment service provided by GoCardless Limited.

Personal Data processed: email address; payment info.

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

### **Griffin (Griffin Bank Ltd.)**

Griffin provides a service that allows the creation of virtual accounts to directly collect repayments from merchants.

Personal Data processed: bank account details; transaction information; contact information.

<https://griffin.com/privacy>

## **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable SAPI to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of SAPI.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### **Amazon Web Services (AWS) (Amazon Web Services, Inc.)**

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

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

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

### **SiteGround Hosting**

SiteGround Hosting is a hosting service provided by SiteGround Hosting Ltd. or by SG Hosting Inc., depending on how the Owner manages the Data processing.

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

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

## **Information collection**

### **Credit Reference Agencies**

In order to process Users' application, SAPI will perform credit and identity checks on Users with one or more credit reference agencies ("CRAs"). Where Users take funding services from SAPI, SAPI may also make periodic searches at CRAs to manage Users' account with SAPI.

To do this, SAPI will supply Users' personal information to CRAs and they will give the SAPI information about the User. This will include information from Users' credit application, financial situation and financial history. CRAs will supply to SAPI both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

SAPI will use this information to:

- Assess Users' creditworthiness and whether they can afford to take the product;
- Verify the accuracy of the data that Users have provided to SAPI;

- Prevent criminal activity, fraud and money laundering;
- Manage Users' account(s);
- Trace and recover any outstanding amounts; and
- Ensure any offers provided to the Users are appropriate to their circumstances.

SAPI will continue to exchange information about the Users with CRAs while the Users have a relationship with SAPI. SAPI will also inform the CRAs about the Users' activities with SAPI. If Users receive any monies from SAPI and do not repay in full and on time, CRAs will record the outstanding due amounts. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from SAPI they will place a search footprint on Users' credit file that may be seen by other lenders.

If Users are making a joint application, or tell SAPI that Users have a spouse or financial associate, SAPI will link the records together, so Users should make sure to discuss this with their spouse or financial associate, and share this information to such persons, before lodging the application. CRAs will also link Users' records together and these links will remain on the files of Users and their partner until such time as Users and their partners successfully file for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at <https://www.experian.co.uk/legal/crain/>

## **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 SAPI. The interaction and information obtained through SAPI are always subject to the User's privacy settings for each social network. This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on SAPI isn't being connected back to the User's profile.

### **Facebook Like button and social widgets**

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

Personal Data processed: Tracker; Usage Data.

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

## **Location-based interactions**

### **Geolocation (SAPI)**

SAPI may collect, use, and share User location Data in order to provide location-based services.

Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by SAPI.

Personal Data processed: geographic position.

### **Non-continuous geolocation (SAPI)**

SAPI may collect, use, and share User location Data in order to provide location-based services.

Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by SAPI.

The geographic location of the User is determined in a manner that isn't continuous, either at the specific request of the User or when the User doesn't point out its current location in the appropriate field and allows the application to detect the position automatically.

Personal Data processed: geographic position.

## **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.

## **Sendgrid (Sendgrid)**

Sendgrid is an email address management and message sending service provided by Sendgrid Inc.

Personal Data processed: company name; country; date of birth; email address; first name; gender; last name; phone number; physical address; Tracker; Usage Data.

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

## **Brevo email (SendinBlue SAS)**

Brevo email is an email address management and message-sending service provided by SendinBlue SAS.

Personal Data processed: email address; Trackers; Usage Data.

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

## **Brevo SMS (SendinBlue SAS)**

Brevo SMS is a phone numbers management and communication service provided by SendinBlue SAS.

Personal Data processed: phone number; Trackers; Usage Data.

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

## **Managing data collection and online surveys**

This type of service allows SAPI to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

## **Facebook lead ads**

Facebook lead ads is an advertising and data collection service provided by Meta Platforms, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that allows form-based ads to be shown to Users pre-populated with Personal Data from their Facebook profiles, such as names and email addresses. Depending on the type of advertisement, Users may be requested to provide further information.

Form submission results in the collection and processing of these Data by the Owner under this privacy policy, and only for the specific purpose outlined on the form and/or inside this privacy policy, where provided.

Users may exercise their rights, at any time, including the right to withdraw their consent to the processing of their Data, as specified in the section containing information about User rights in this privacy policy.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; email address; first name; gender; last name; marital status; phone number; physical address; profession; state; Tracker; Usage Data; ZIP/Postal code.

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

## **Platform services and hosting**

These services have the purpose of hosting and running key components of SAPI, therefore allowing the provision of SAPI 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**

WordPress.com is a platform provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows the Owner to build, run and host SAPI.

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

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

## **Registration and authentication**

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

### **Stripe OAuth (Stripe Inc)**

Stripe OAuth is a registration and authentication service provided by Stripe, Inc. and is connected to the Stripe network.

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

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

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

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

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

Personal Data processed: billing address; city; company name; country; county; date of birth; email address; field of activity; first name; gender; house number; language; last name; password; phone number; physical address; picture; profession; profile picture; state; Tax ID; Tracker; Twitter handle; Usage Data; User ID; username; various types of Data; VAT Number; website; workplace; ZIP/Postal code.

## **Remarketing and behavioral targeting**

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

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.

### **Facebook Custom Audience (Facebook Ireland Ltd)**

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook Ireland Ltd that connects the activity of SAPI with the Facebook advertising network.

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

Personal Data processed: email address; Tracker.

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

### **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 SAPI with the Google Ads advertising network and the DoubleClick Cookie.

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

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

Personal Data processed: Tracker; Usage Data.

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

### **Facebook Remarketing**

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

Personal Data processed: Tracker; Usage Data.

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

### **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 SAPI and allows selected advertising partners to display targeted ads across the web to them.

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

Personal Data processed: Tracker; Usage Data.

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

### **LinkedIn Website Retargeting (LinkedIn Corporation)**

LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of SAPI with the LinkedIn advertising network.

Personal Data processed: Tracker; Usage Data.

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

## **Social features**

### **Public profile (SAPI)**

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

Personal Data processed: city; company name; country; county; first name; geographic position; last name; phone number; physical address; picture; profession; state; username.

### **Inviting and suggesting friends (SAPI)**

SAPI may use the Personal Data provided to allow Users to invite their friends - for example through the address book, if access has been provided - and to suggest friends or connections inside it.

Personal Data processed: various types of Data.

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on SAPI in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### **Google Tag Manager**

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data.

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

### **Segment (Segment Inc.)**

Segment is a tag management service provided by Segment.io, Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [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 SAPI, 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 SAPI.

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

### **Intercom (Intercom Software UK Limited)**

Intercom is a User database management service provided by Intercom Software UK Limited.

Intercom can also be used as a medium for communications, either through email, or through messages within SAPI. Intercom Messenger may use Trackers to recognize and track Users behavior.

Personal Data processed: Data communicated while using the service; email address; Tracker; Universally unique identifier (UUID); Usage Data; various types of Data as specified in the privacy policy of the service.

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

### **Salesforce Sales Cloud (Salesforce.com, inc.)**

Salesforce Sales Cloud is a User database management service provided by salesforce.com, inc.

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

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

## **Information on opting out of interest-based advertising**

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

## **Further information about the processing of Personal Data**

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

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

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

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

### **Automated decision-making**

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on the User, is taken solely by technological means, without any human intervention. SAPI may use the User's Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. SAPI adopts automated decision-making processes as far as necessary to enter into or perform a contract between User and Owner, or on the basis of the User's explicit consent, where such consent is required by the law.

Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may also be provided by third parties.

The rationale behind the automated decision making is:

- to enable or otherwise improve the decision-making process;
- to grant Users fair and unbiased treatment based on consistent and uniform criteria;
- to reduce the potential harm derived from human error, personal bias and the like which may potentially lead to discrimination or imbalance in the treatment of individuals etc.;

- to reduce the risk of User's failure to meet their obligation under a contract. To find out more about the purposes, the third-party services, if any, and any specific rationale for automated decisions used within SAPI, Users can check the relevant sections in this document.

## **Consequences of automated decision-making processes for Users and rights of Users subjected to it**

As a consequence, Users subject to such processing, are entitled to exercise specific rights aimed at preventing or otherwise limiting the potential effects of the automated decisions taken.

In particular, Users have the right to:

- obtain an explanation about any decision taken as a result of automated decision-making and express their point of view regarding this decision;
- challenge a decision by asking the Owner to reconsider it or take a new decision on a different basis;
- request and obtain from the Owner human intervention on such processing.

To learn more about the User's rights and the means to exercise them, the User is invited to consult the section of this document relating to the rights of the User.

## **localStorage**

localStorage allows SAPI to store and access data right in the User's browser with no expiration date.

## **Preference Cookies**

Preference Cookies store the User preferences detected on SAPI in the local domain such as, for example, their timezone and region.

## **Push notifications**

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

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

Users must be aware that disabling push notifications may negatively affect the utility of SAPI.

## **Personal Data collected through sources other than the User**

The Owner of SAPI may have legitimately collected Personal Data relating to Users without their knowledge by reusing or sourcing them from third parties on the grounds mentioned in the section specifying the legal basis of processing.

Where the Owner has collected Personal Data in such a manner, Users may find specific information regarding the source within the relevant sections of this document or by contacting the Owner.

## **Push notifications based on the User's geographic location**

SAPI may use the User's geographic location to send push notifications for the purposes outlined in this privacy policy.

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

Users must be aware that disabling push notifications may negatively affect the utility of SAPI.

## **Push notifications for direct marketing**

SAPI may send push notifications to the User for the purpose of direct marketing (to propose services and products provided by third parties or unrelated to the product or service provided by SAPI).

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

Users must be aware that disabling push notifications may negatively affect the utility of SAPI.

Besides applicable device settings, the User may also make use of the rights described under User rights in the relevant section of this privacy policy.

## **Selling goods and services online**

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by SAPI depends on the payment system used.

## sessionStorage

sessionStorage allows SAPI to store and access data right in the User's browser. Data in sessionStorage is deleted automatically when the session ends (in other words, when the browser tab is closed).

## The Service is intended for adults

Users declare themselves to be adult according to their applicable legislation. Minors may not use SAPI.

## Cookie Policy

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

## Further Information for Users

### Legal basis of processing

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

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

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

### Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

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

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

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

## The rights of Users based on the General Data Protection Regulation (GDPR)

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

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.



- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

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

### **Details about the right to object to processing**

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

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

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

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

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to "standard contractual clauses" provided by the European Commission.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of SAPI 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, SAPI 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, SAPI and any third-party services may collect files that record interaction with SAPI (System logs) or use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy**

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

## **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within SAPI 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 SAPI (or third-party services employed in SAPI), which can include: the IP addresses or domain names of the computers utilized by the Users who use SAPI, 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 SAPI 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 SAPI. The Data Controller, unless otherwise specified, is the Owner of SAPI.

### **SAPI (or this Application)**

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

### **Service**

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

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

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

### **Cookie**

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

**Tracker**

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

**Legal information**

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

Latest update: October 03, 2024