

Willson Privacy Policy

Willson collects certain Personal Data from its Users.

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

SUMMARY OF POLICIES

Personal Data processed for the following purposes and using the following services:

- **Content Performance and Functionality Testing (A/B Testing)**
 - **Firebase Remote Configuration**
Personal Data: various types of Data as specified in the privacy policy of the service
- **Device permissions for access to personal data**
 - **Device permissions for access to personal data**
Personal Data: Camera authorization; Camera authorization, without saving or recording;
- **Viewing content from external platforms**
 - **Video widgets on YouTube**
Personal data: cookies; Usage Data
 - **Google Fonts**
Personal Data: Usage Data; various types of Data as specified in the privacy policy of the service
- **Hosting & Back-End Infrastructure**
 - **Heroku**
Personal Data: Usage Data; various types of Data as specified in the privacy policy of the service
- **Infrastructure monitoring**
 - **Crashlytics (Crashlytics)**
Personal data: information about accidents; device information; Universal Unique Identifier (UUID)
- **Managing Contacts and Sending Messages**
 - **Firebase Notifications, Firebase Cloud Messaging, Apple Push Notification**
Personal Data: various types of Data as specified in the privacy policy of the service
- **Platform & Hosting Services**
 - **Apple App Store and Google Play Store**
Personal Data: Usage Data
- **Registration & Authentication**
 - **Facebook and Google OAuth authentication**
Personal Data: various types of Data as specified in the privacy policy of the service
 - **Direct Recording**
Personal Data: email address; first name; surname; password
 - **Sign in with Apple**
Personal Data: name; User ID
- **User Database Management**
 - **Intercom**
Personal data: cookies; email address; Usage Data; various types of Data as specified in the privacy policy of the service

Further information on the processing of Personal Data

- **Push notifications**
Willson may send push notifications to you to achieve the purposes described in this privacy policy.
In most cases, users can choose not to receive push notifications by visiting their

device's settings, such as notification settings for mobile phones, and then change those settings for Willson, some or all apps on the specific device.

Users should be aware that disabling push notifications can negatively affect the usefulness of Willson.

Contact Information

- **Data Controller and Data Controller**
Walk of Life Sas di Antonio Genovesi
Via Gregorio Casinovi 10, Frascati (RM),
ITaly 00044
Owner's Contact Email: donorati@walkof.life

COMPREHENSIVE POLICY

Data Controller and Data Controller

Walk of Life Sas di Antonio Genovesi
Via Gregorio Casinovi 10, Frascati (RM),
ITaly 00044
Owner's Contact Email: donorati@walkof.life

Types of Data Collected

Among the types of Personal Data that Willson collects, either on its own or through third parties, are: Cookies; Usage Data; email address; Universal Unique Identifier (UUID); Crash information; device information; geography/region; number of Users; number of sessions; duration of the session; The application opens; Application updates; first launches; operating systems; Camera authorization; Camera authorization, without saving or recording; general activity data; company name; Data communicated during the use of the service; first name; surname; password; User ID.

Full details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanatory texts displayed before the Data is collected.

Personal Data may be freely provided by you, or, in the case of Usage Data, collected automatically when you use Willson.

Unless otherwise stated, all Data requested by Willson is mandatory, and failure to provide such Data may result in Willson not being able to provide its services. In cases where Willson expressly states that certain Data is not mandatory, Users are free not to communicate such Data without affecting the availability or operation of the Service.

Users who are unsure which Personal Data is mandatory are invited to contact the Data Controller. Any use of Cookies – or other tracking tools – by Willson or the owners of the third-party services used by Willson has the purpose of providing the Service requested by the User, in addition to any other purposes described in this document and in the Cookie Policy.

You are responsible for all Third-Party Personal Data obtained, posted, or shared through Willson.

Methods and place of data processing

Processing methods

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

The processing of Data is carried out using IT and/or telematic tools, following organizational procedures and methods 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 of the processing, involved in Willson's operations (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) appointed, if necessary, as Data Processors by the Data Controller. The updated list of such subjects may be requested from the Data Controller at any time.

Place

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

Depending on your location, the transfer of data may involve the transfer of your Data to a country other than your own. To find out more about the place of processing of such transferred Data, Users can consult the section containing details on the processing of Personal Data.

Retention time

Unless otherwise specified herein, Personal Data will be processed and stored for as long as required by the purpose for which it was collected and may be retained for longer due to applicable legal obligations or on the basis of Users' consent.

The purposes of the processing

The Data concerning the User are collected to allow the Data Controller to provide its Service, comply with its legal obligations, respond to requests for execution, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activities, as well as the following: Analytics, Registration and Authentication, Remarketing and behavioral targeting, Advertising, Infrastructure Monitoring, Backend Hosting & Infrastructure, Contact Management & Message Sending, Content Performance & Functionality Testing (A/B Testing), Device Permissions for Personal Data Access, Business Data Management, Platform Services & Hosting, Traffic Optimization & Distribution, User Database Management, Displaying Content from External Platforms, and Connecting Data.

For specific information on 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 access to personal data

Depending on your specific device, Willson may request certain permissions that allow you to access Your Device Data as described below.

By default, these permissions must be granted by the user before they can access their information. Once granted, the authorization can be revoked by the User at any time. In order to revoke such permissions, Users may refer to the device settings or contact the Owner for assistance at the contact details provided herein.

The exact procedure for checking app permissions may depend on your device and software.

Please note that revoking such permissions may have an impact on the proper functioning of Willson. If you grant any of the permissions listed below, your Personal Data may be processed (i.e., accessed, modified, or removed) by Willson.

Camera Authorization

Used to access the camera or capture images and videos from the device.

Camera authorization, no saving or recording

Used to access the camera or capture images and videos from the device. Willson does not save or record the camera's output.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- **Analytics**
- **Connecting Data**
- **Content Performance and Functionality Testing (A/B Testing)**
- **Device permissions for access to personal data**
- **Viewing content from external platforms**
- **Task Data Management**
- **Hosting & Back-End Infrastructure**
- **Infrastructure monitoring**
- **Managing Contacts and Sending Messages**
- **Managing Data Collection and Online Surveys**
- **Platform & Hosting Services**
- **Registration & Authentication**
- **Remarketing and behavioral targeting**
- **Traffic Optimization and Distribution**
- **User Database Management**

Further information on the processing of Personal Data

- **Push notifications**
- **Push notifications for direct marketing**

Cookie Policy

Willson uses Trackers. To find out more, Users can consult the Cookie Policy.

Additional information for users

Legal basis for the processing

The Data Controller may process Personal Data relating to Users if one of the following hypotheses occurs:

- Users have given their consent for one or more specific purposes.
- the provision of Data is necessary for the execution of a contract with the User and/or for any pre-contractual obligations of the same;
- the processing is necessary for compliance with a legal obligation to which the Data Controller is subject;
- the processing is related to a task carried out in the public interest or in connection with the exercise of official authority vested in the Data Controller;
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties.

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

Learn more about retention time

Unless otherwise specified herein, Personal Data will be processed and stored for as long as required by the purpose for which it was collected and may be retained for longer due to applicable legal obligations or on the basis of Users' consent.

Therefore:

- Personal Data collected for purposes related to the execution of a contract between the Data Controller and the User will be stored until the complete execution of such contract.
- Personal Data collected for the purposes of the legitimate interest of the Data Controller will be kept for the time necessary to fulfil these purposes. Users can find specific information regarding the legitimate interests pursued by the Data Controller within the relevant sections of this document or by contacting the Data Controller.

The Data Controller may be authorized to retain Personal Data for a longer period whenever the User has given consent to such processing, provided that such consent is not withdrawn. In addition, the Data Controller may be obliged to retain Personal Data for a longer period whenever it is necessary to comply with a legal obligation or by order of an authority.

Once the retention period has expired, the Personal Data will be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be asserted after the expiry of the retention period.

Your rights under the General Data Protection Regulation (GDPR)

Users may exercise certain rights in relation to their Data processed by the Data Controller.

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

- **Withdraw your consent at any time.** You have the right to withdraw your consent where you have previously consented to the processing of your Personal Data.
- **Object to the processing of your Data.** You have the right to object to the processing of your Data where the processing is carried out on a legal basis other than consent.
- **Access your data.** Users have the right to know whether Data is being processed by the Data Controller, to obtain information regarding certain aspects of the processing and to obtain a copy of the Data being processed.
- **Verify and ask for rectification.** Users have the right to verify the accuracy of their Data and to request that it be updated or corrected.
- **Restrict the processing of your Data.** You have the right to restrict the processing of your data. In this case, the Data Controller will not process your Data for any purpose other than their storage.
- **Obtain the deletion or removal of your personal data.** Users have the right to obtain from the Data Controller the deletion of their Data.
- **Receive your Data and have it transferred to another data controller.** You have the right to receive your Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another data controller without hindrance.
- **File a complaint.** Users have the right to lodge a complaint with the competent data protection authority.
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Users also have the right to know the legal basis for the transfer of Data abroad, including to any international organization under public international law or established by two or more countries, such as the UN, and the security measures adopted by the Data Controller to safeguard their Data.

Details on your right to object to processing

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

You should be aware that, however, if your Personal Data is processed for direct marketing purposes, you may object to such processing at any time, free of charge and without providing any justification. If you object to processing for direct marketing purposes, your Personal Data will no longer be processed for such purposes. To find out if the Data Controller 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 the User's rights may be addressed to the Data Controller through the contact details provided in this document. These requests are free of charge and will be answered by the Data Controller as soon as possible and in any case 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 Data Controller to each recipient, if any, to whom the Personal Data have been communicated, unless this proves impossible or involves a disproportionate effort. At the request of the Users, the Owner will inform them of these recipients.

Learn more about data collection and processing

Proceedings

The User's Personal Data may be used for legal purposes by the Data Controller in court or in the preparatory stages of any legal action arising from the improper use of Willson or its Services.

The User declares to be aware that the Data Controller may be required to disclose personal data at the request of public authorities.

Learn more about your Personal Data

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

System Logs and Maintenance

For operation and maintenance purposes, Willson and any third-party services may collect files that record your interaction with Willson (system logs) or use other Personal Data (such as your IP address) for this purpose.

Information not contained in this policy

Further details regarding the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the top of this document.

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 Willson and/or - to the extent technically and legally feasible - by sending a communication to Users via any contact information available to the Owner. We strongly recommend that you check this page often, referring to the date of the last modification at the bottom.

If the changes concern the processing activities carried out on the basis of the User's consent, the Data Controller will collect new consent from the User, where required.

- **Analytics**

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

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

- To understand Google's use of Data, please see Google's partner policy.** Firebase Analytics may share Data with other tools provided by Firebase, such as crash reporting, authentication, remote configuration, or notifications. The User can consult this privacy policy to find a detailed explanation of the other tools used by the Data Controller. Willson uses mobile identifiers and cookie-like technologies to run the Firebase Analytics service. Users can opt out of certain Firebase features through applicable device settings, such as device advertising settings for mobile phones, or by following the instructions in other Firebase-related sections of this privacy statement, if available.

- Personal Data processed: Opening of the application; Application updates; Biscuits; device information; first launches; geography/region; In-app purchases; number of sessions; number of Users; operating systems; duration of the session.

- Place of processing: United States – Privacy Policy.

- **Content Performance and Functionality Testing (A/B Testing)**

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

- **Firebase Remote Configuration (Google LLC)**
 Firebase Remote Config is an A/B testing and configuration service provided by Google LLC.
 Personal Data processed: various types of Data as specified in the privacy policy of the service.
 Place of processing: United States – Privacy Policy.
- **Device permissions for access to personal data**
 Willson requests certain permissions from Users that allow it to access Your Device Data as described below.
- **Device Permissions for Access to Personal Data (Willson)**
 Willson requests certain permissions from Users that allow it to access Your Device Data, as summarized here and described in this document.
 Personal Data processed: Authorization of the camera; Camera authorization, no saving or recording.
- **Viewing content from external platforms**
 This type of service allows you to view content hosted on external platforms directly from Willson's pages and interact with them.
 This type of service may still collect web traffic data for the pages where the service is installed, even when Users are not using it.
- **YouTube video widget (Google LLC)**
 YouTube is a video content viewing service provided by Google LLC that allows Willson to embed such content within its pages.
 Personal Data processed: Cookies; Usage Data. Place of processing: United States – Privacy Policy.
- **Google Fonts (Google LLC)**
 Google Fonts is a typeface display service provided by Google LLC that allows Willson to embed such content on its pages.
 Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.
 Place of processing: United States – Privacy Policy.
- **Task Data Management**
 This type of service allows the Data Controller to use data relating to the activities collected from the user's device to allow Willson to function or to provide specific functionalities. This can include movement, heart rate, elevation change, or data about your surroundings.
 Depending on what is described below, third parties may be involved in monitoring your activity. Most devices allow you to control what Data is accessed or stored.
- **Activity data tracked by the user's device (Willson)**
 Willson uses certain activity data tracked by your device to function or to provide specific functionality.
 Personal Data processed: Date of birth; gender; general data on work activity; heart rate and other vital data.

Hosting & Back-End Infrastructure

This type of service is intended to host Data and files that enable Willson to run and deploy, as well as to provide a ready-made infrastructure to run specific Willson features or parts.

Some of the services listed below, if any, may operate through geographically distributed servers, making it difficult to determine the actual location where Personal Data is stored.

Heroku

Heroku is a hosting and backend service provided by Salesforce.

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

- **Infrastructure monitoring**
This type of service allows Willson to monitor the use and behavior of its components in order to improve their performance, operation, maintenance, and troubleshooting.
Which Personal Data is processed depends on the characteristics and methods of implementation of these services, the function of which is to filter Willson's activities.
- **Crashlytics (Google LLC)**
Crashlytics is a tracking service provided by Google LLC.
Personal Data processed: Information on incidents; device information; Universal Unique Identifier (UUID).
Place of processing: United States – Privacy Policy.
- **Managing Contacts and Sending Messages**
This type of service allows you to manage a database of email contacts, telephone contacts or any other contact information to communicate with the User.
These services may also collect data about the date and time the message was viewed by you, as well as when you interacted with it, such as by clicking on links included in the message.
- **Firebase Notifications(Google LLC)**
Firebase Notifications is a message sending service provided by Google LLC. Firebase Notifications can be integrated with Firebase Analytics to target analytics-based audiences and track open and conversion events.
Personal Data processed: various types of Data as specified in the privacy policy of the service.
Place of processing: United States – Privacy Policy.
- **Firebase Cloud Messaging (Google LLC)**
Firebase Cloud Messaging is a messaging service provided by Google LLC. Firebase Cloud Messaging allows the Owner to send messages and notifications to Users on platforms such as Android, iOS and web. Messages can be sent to individual devices, groups of devices, or specific topics or segments of users.
Personal Data processed: various types of Data as specified in the privacy policy of the service.
Place of processing: United States – Privacy Policy.
- **Managing Data Collection and Online Surveys**
This type of service allows Willson to manage the creation, implementation, administration, distribution, and analysis of online forms and surveys in order to collect, save, and reuse the Data of any User who responds.
The Personal Data collected depends on the information requested and provided by Users in the corresponding online form.
These services may be integrated with a wide range of third-party services to allow the Data Controller to carry out subsequent operations relating to the Data processed, such as contact management, sending messages, analysis, advertising and payment processing.
- **Platform & Hosting Services**
These services are intended to host and manage key components of Willson, thereby enabling the provision of Willson within a unified platform. These platforms provide the Data Controller with a wide range of tools – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – which involve the collection and processing of Personal Data.
Some of these services operate through geographically distributed servers, making it difficult to determine the actual location where Personal Data is stored.
- **Apple App Store (Apple Inc.)**
Willson is distributed on the Apple App Store, a mobile app distribution platform, provided by Apple Inc. By virtue of distribution through this app store, Apple collects basic analytics and provides reporting capabilities that allow the Owner to view usage analytics data and measure Willson's performance. Much of this information is processed on an opt-in basis. Users can deactivate this analytics feature directly via their device settings. More information on how to manage analytics settings can be found on this page.
Personal Data processed: Usage Data.
Place of processing: United States – Privacy Policy.
- **Google Play Store (Google LLC)**
Willson is distributed on the Google Play Store, a platform for the distribution of mobile apps,

provided by Google LLC. By virtue of distribution through this app store, Google collects usage and diagnostic data and shares aggregate information with the Owner. Much of this information is processed on an opt-in basis. Users can deactivate this analytics feature directly via their device settings. More information on how to manage analytics settings can be found on this page.

Personal Data processed: Usage Data.

Place of processing: United States – Privacy Policy.

- **Registration & Authentication**

By registering or authenticating, you allow Willson to identify you and give you access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, Willson may access certain Data, maintained by such 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 linked to the social network Facebook.

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

Place of processing: United States – Privacy Policy.

- **Google OAuth (Google LLC)**

Google OAuth is a registration and authentication service provided by Google LLC and is connected to the Google network.

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

Place of processing: United States – Privacy Policy.

- **Direct Recording (Willson)**

You register by filling out the registration form and providing your Personal Data directly to Willson.

Personal Data processed: date of birth; email address; first name; gender; surname; watchword; image.

- **Sign in with Apple (Apple Inc.)**

Sign in with Apple is a registration and authentication service provided by Apple Inc. In cases where Users are required to provide their email address, Sign in with Apple may generate a private forwarding address on behalf of Users that automatically forwards messages to their verified personal email account, thereby protecting their actual email address from Owner.

Personal Data processed: name; User ID.

Place of processing: United States – Privacy Policy.

- **Traffic Optimization and Distribution**

This type of service allows Willson to distribute its content using servers located in different countries and optimize its performance.

Which Personal Data is processed depends on the characteristics and manner in which those services are implemented. Their function is to filter communications between Willson and the User's browser.

Given the widespread use of this system, it is difficult to determine where content that may contain your Personal Information is transferred.

- **User Database Management**

This type of service allows the Owner to build user profiles from an email address, personal name or other information that the User provides to Willson, as well as to track the User's activities through analytics features. This Personal Data may also be combined with publicly available information about the User (such as social network profiles) and used to create private profiles that the Owner can view and use to improve Willson.

Some of these services may also allow time-based messages to be sent to you, such as emails based on specific actions you have performed on Willson.

Further information on the processing of Personal Data

- **Push notifications**

Willson may send push notifications to you to achieve the purposes described in this privacy policy. In most cases, users can choose not to receive push notifications by visiting their device's settings, such as notification settings for mobile phones, and then change those settings for Willson, some or all apps on the specific device.

Users should be aware that disabling push notifications can negatively affect the usefulness of Willson.

- **Push notifications for direct marketing**

We may send you push notifications for our direct marketing purposes (to offer you services and products provided by third parties or unrelated to the product or service provided by us). In most cases, users can opt out of receiving push notifications by visiting their device's settings, such as notification settings for mobile phones, and then changing those settings for Willson or all apps on the specific device. Users should be aware that disabling push notifications can negatively affect the usefulness of Willson. In addition to the applicable device settings, you may also exercise the rights described in the User Rights section of the relevant section of this privacy policy.

Cookie Policy

Willson uses Trackers. To find out more, Users can consult the Cookie Policy.

Additional information for users

Legal basis for the processing

The Data Controller may process Personal Data relating to Users if one of the following hypotheses occurs:

- Users have given their consent for one or more specific purposes.
- the provision of Data is necessary for the execution of a contract with the User and/or for any pre-contractual obligations of the same;
- the processing is necessary for compliance with a legal obligation to which the Data Controller is subject;
- the processing is related to a task carried out in the public interest or in connection with the exercise of official authority vested in the Data Controller;
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties.

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

Learn more about retention time

Unless otherwise specified herein, Personal Data will be processed and stored for as long as required by the purpose for which it was collected and may be retained for longer due to applicable legal obligations or on the basis of Users' consent.

Therefore:

- Personal Data collected for purposes related to the execution of a contract between the Data Controller and the User will be stored until the complete execution of such contract.
- Personal Data collected for the purposes of the legitimate interest of the Data Controller will be kept for the time necessary to fulfil these purposes. Users can find specific information regarding the legitimate interests pursued by the Data Controller within the relevant sections of this document or by contacting the Data Controller.

The Data Controller may be authorized to retain Personal Data for a longer period whenever the User has given consent to such processing, provided that such consent is not withdrawn. In addition, the Data Controller may be obliged to retain Personal Data for a longer period whenever it is necessary to comply with a legal obligation or by order of an authority.

Once the retention period has expired, the Personal Data will be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be asserted after the expiry of the retention period.

Your rights under the General Data Protection Regulation (GDPR)

Users may exercise certain rights in relation to their Data processed by the Data Controller.

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

- **Withdraw your consent at any time.** You have the right to withdraw your consent where you have previously consented to the processing of your Personal Data.
- **Object to the processing of your Data.** You have the right to object to the processing of your Data where the processing is carried out on a legal basis other than consent.
- **Access your data.** Users have the right to know whether Data is being processed by the Data Controller, to obtain information regarding certain aspects of the processing and to obtain a copy of the Data being processed.
- **Verify and ask for rectification.** Users have the right to verify the accuracy of their Data and to request that it be updated or corrected.
- **Restrict the processing of your Data.** You have the right to restrict the processing of your data. In this case, the Data Controller will not process your Data for any purpose other than their storage.
- **Obtain the deletion or removal of your personal data.** Users have the right to obtain from the Data Controller the deletion of their Data.
- **Receive your Data and have it transferred to another data controller.** You have the right to receive your Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another data controller without hindrance.
- **File a complaint.** Users have the right to lodge a complaint with the competent data protection authority.

Users also have the right to know the legal basis for the transfer of Data abroad, including to any international organization under public international law or established by two or more countries, such as the UN, and the security measures adopted by the Data Controller to safeguard their Data.

Details on your right to object to processing

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

You should be aware that, however, if your Personal Data is processed for direct marketing purposes, you may object to such processing at any time, free of charge and without providing any justification. If you object to processing for direct marketing purposes, your Personal Data will no longer be processed for such purposes. To find out if the Data Controller 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 the User's rights may be addressed to the Data Controller through the contact details provided in this document. These requests are free of charge and will be answered by the Data Controller as soon as possible and in any case 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 Data Controller to each recipient, if any, to whom the Personal Data have been communicated, unless this proves impossible or involves a disproportionate effort. At the request of the Users, the Owner will inform them of these recipients.

Learn more about data collection and processing

Proceedings

The User's Personal Data may be used for legal purposes by the Data Controller in court or in the preparatory stages of any legal action arising from the improper use of Willson or its Services.

The User declares to be aware that the Data Controller may be required to disclose personal data at the request of public authorities.

Learn more about your Personal Data

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

System Logs and Maintenance

For operation and maintenance purposes, Willson and any third-party services may collect files that record your interaction with Willson (system logs) or use other Personal Data (such as your IP address) for this purpose.

Information not contained in this policy

Further details regarding the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the top of this document.

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 Willson and/or - to the extent technically and legally feasible - by sending a communication to Users via any contact information available to the Owner. We strongly recommend that you check this page often, referring to the date of the last modification at the bottom. If the changes concern the processing activities carried out on the basis of the User's consent, the Data Controller will collect new consent from the User, where required.

Definitions and regulatory references

Personal Data (or Data)

Any information that, directly, indirectly or in connection with other information, Personal identification number: allows the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Willson (or third-party services employed by Willson), which may include: the IP addresses or domain names of the computers used by Users who use Willson, the addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.), the country of origin, the characteristics of the browser and operating system used by the User, the various time details per visit (for example, the time spent on each page within the Application) and the details relating to the path followed within the Application with particular reference to the sequence of pages visited, and other parameters related to the operating system of the device and/or the User's IT environment.

User

The individual using Willson who, unless otherwise specified, is the same as the Data Subject.

Interested

The natural person to whom the Personal Data relates.

Data Processor (or Data Processor)

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

Data Controller (or Data Controller)

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 relating to the operation and use of Willson. The Data Controller, unless otherwise specified, is the Willson Data Controller.

Willson (or this Application)

The means by which your Personal Data is collected and processed.

Service

The service provided by Willson as described in its terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references to the European Union contained herein include all current member states of the European Union and the European Economic Area.

Cookie

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

Locator

Tracker means any technology – such as cookies, unique identifiers, web beacons, embedded scripts, e-tags, and fingerprinting – that enables the tracking of users, such as by accessing or storing information on the user's device.

Legal information

This privacy policy relates solely to Willson, unless otherwise specified within this document.

Definitions and regulatory references

Last updated: 02 February 2024

Heroku hosts this content and collects only the Personal Data that is strictly necessary for its provision.