

# Privacy Policy

( [www.wearme30times.com](http://www.wearme30times.com) )

**This WebApplication collects some Personal Data from its Users.**

## OWNER AND DATA CONTROLLER

Genuine Way SA  
Via Somaini 10  
6900 Lugano (CH)  
Owner contact email: [info@genuineway.io](mailto:info@genuineway.io)

## 1. TYPES OF DATA COLLECTED

Among the types of Personal Data that this WebApp collects, by itself or through third parties, there are:

email address; first name; last name; IP Address; Cookies; Usage Data; Any other data explicitly requested by the service provider to the user.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this WebApp.

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

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this WebApp or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

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

## **2. MODE AND PLACE OF PROCESSING THE DATA**

### **METHODS OF PROCESSING**

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

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

## **3. LEGAL BASIS OF PROCESSING**

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

Users have given their consent for one or more specific purposes.

Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;

provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;

processing is necessary for compliance with a legal obligation to which the Owner is subject;

processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;

processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

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

## **4. DATA**

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

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

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

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

## **5. RETENTION TIME**

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

Therefore:

Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.

Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn.

Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

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

## **6. THE PURPOSES OF PROCESSING**

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes:

Contacting the User, Managing contacts and sending messages, Handling payments, Hosting and backend infrastructure, Interaction with external social networks and platforms, Platform services and hosting, Analytics, Displaying content from external platforms, Tag Management, Traffic optimization and distribution, Remarketing and behavioral targeting, Advertising, Heat mapping and session recording and Interaction with online survey platforms.

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

## 7. DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

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

### ADVERTISING & NEWSLETTERS

This type of service allows User Data to be utilized for advertising communication purposes displayed in the form of banners and other advertisements on this Website, as well as company commercial communication & newsletters, possibly based on User interests, both by the Owner and its b2b brand clients (please see par. 6).

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

Some of the services listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Website. For more information, please check the privacy policies of the relevant services.

In addition to any opt-out offered by any of the services below, the User may opt out of a third-party service's use of cookies for certain advertising features by visiting the Network Advertising Initiative opt-out page.

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

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

**GOOGLE ANALYTICS** (GOOGLE INC.) Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

**MAILING LIST OR NEWSLETTER (THIS WEBAPP)** 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 this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase. Personal Data collected: email address; first name; last name.

**CONTACT FORM (THIS WEBAPP)** By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header. Personal Data collected: email address; first name; last name.

**PAYPAL (PAYPAL INC.)** PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments. Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – Privacy Policy.

**HOSTING AND BACKEND INFRASTRUCTURE** This type of service has the purpose of hosting Data and files that enable this Website to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Website. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

**YOUTUBE BUTTON AND SOCIAL WIDGETS (GOOGLE INC.)** The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google Inc. Personal Data collected: Usage Data.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

**FACEBOOK LIKE BUTTON AND SOCIAL WIDGETS (FACEBOOK, INC.)** The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc. Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

**TWITTER TWEET BUTTON AND SOCIAL WIDGETS (TWITTER, INC.)** The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc. Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

**PINTEREST “PIN IT” BUTTON AND SOCIAL WIDGETS (PINTEREST)** The Pinterest “Pin it” button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc. Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

**INTERACTION WITH ONLINE SURVEY PLATFORMS** This type of service allows Users to interact with third-party online survey platforms directly from the pages of this Website. If one of these

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

**HOTJAR POLL & SURVEY WIDGETS** (HOTJAR LTD.) The Hotjar Poll & Survey widgets are services that enable interaction with the Hotjar platform provided by Hotjar Ltd.

Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User’s data. This is a setting that is available in all major browsers. Find Hotjar’s opt-out information here. Personal Data collected: Cookies; Usage Data; various types of Data.

Place of processing: Malta – Privacy Policy – Opt Out.

**MANAGING CONTACTS AND SENDING MESSAGES** This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User. These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

**MAILCHIMP** (THE ROCKET SCIENCE GROUP, LLC.) Mailchimp is an email address management and message sending service provided by The Rocket Science Group, LLC. Personal Data collected: email address; first name; last name.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

**PLATFORM SERVICES AND HOSTING** These services have the purpose of hosting and running key components of this Website, therefore allowing the provision of this Website from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

**REMARKETING AND BEHAVIORAL TARGETING** This type of service allows this Website and its partners to inform, optimize and serve advertising based on past use of this Website by the User. This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity. Some services offer a remarketing option based on email address lists. In addition to any opt-out offered by any of the services below, the User may opt out of a third-party service’s use of cookies for certain remarketing features by visiting the Network Advertising Initiative opt-out page.

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

**FACEBOOK REMARKETING** (FACEBOOK, INC.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Website with the Facebook advertising network. Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

**FACEBOOK CUSTOM AUDIENCE** (FACEBOOK, INC.) Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Website with the Facebook advertising network. Users can opt out of Facebook's use of cookies for ads personalization by visiting this opt-out page. Personal Data collected: Cookies; email address.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

**TAG MANAGEMENT** This type of service helps the Owner to manage the tags or scripts needed on this Website 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 IRELAND LIMITED) Google Tag Manager is a tag management service provided by Google Ireland Limited. Personal Data collected: Cookies; Usage Data.

Place of processing: Ireland – Privacy Policy. Privacy Shield participant.

**TRAFFIC OPTIMIZATION AND DISTRIBUTION** This type of service allows this Website to distribute their content using servers located across different countries and to optimize their performance. Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser. Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

## 8. OWNERSHIP OF DATA & TRANSFER OF DATA

By accepting this Privacy Policy the User agrees that the Owner becomes the owner of any data that is sourced according to this Agreement through the WebApplication. In particular, by flagging the acceptance policy in the Register your Purchase section of the Web Application, the User agrees to make its email and name/surname info available to the Owner for commercial purposes.

The Owner may freely make this contact info available to its B2B brand clients to be utilized for newsletter and promotions, as well as a personal contact to unlock any discount coupon offered within the WebApp.

## 9. THE RIGHTS OF USERS

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

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

Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.

Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.

Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.

Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.

Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.

Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.

Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.

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

## **HOW TO EXERCISE THESE RIGHTS**

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

## **10. COOKIE POLICY**

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

## **11. ADDITIONAL INFORMATION ABOUT DATA COLLECTION**

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 this Website or the related Services.

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

**ADDITIONAL INFORMATION ABOUT USER'S PERSONAL DATA** In addition to the information contained in this privacy policy, this WebApp may provide the User with additional and contextual



information concerning particular Services or the collection and processing of Personal Data upon request.

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

**INFORMATION NOT CONTAINED IN THIS POLICY** More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

**HOW “DO NOT TRACK” REQUESTS ARE HANDLED** This Website does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

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

Should the changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, where required.

## 12. DEFINITIONS AND LEGAL REFERENCES

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

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

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

**DATA SUBJECT** The natural person to whom the Personal Data refers.

**DATA PROCESSOR (OR DATA SUPERVISOR)** The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

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

**THIS WEBAPP (OR THIS WEBSITE)** The means by which the Personal Data of the User is collected and processed.

## **SERVICE**

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

**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.

**COOKIES** Small sets of data stored in the User's device.

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

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