

Privacy Policy

Latest update: April 2, 2025 Owner and Data Controller Block360 Pro LLC help@block360.pro

TYPES OF DATA COLLECTED

- Among the types of Personal Data that www.block360.pro collects, by itself or through third parties, there are: Email Address, Cookies, Usage Data ,Geographic Position, Username, Picture, City, Various types of Data and, Phone Number.
- Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy
 policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided
 by the User, or, in case of Usage Data, collected automatically when using www.block360.pro. Unless specified
 otherwise, all Data requested by www.block360.pro is mandatory and failure to provide this Data may make it
 impossible for www.block360.pro to provide its services. In cases where www.block360.pro 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 <u>www.block360.pro</u> or by the owners of third-party services used by <u>www.block360.pro</u> 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 www.block360.pro and confirm that they have the third party's consent to provide the Data to the Owner.

MODE AND PLACE OF PROCESSING THE DATA

Methods of processing

- The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.
- The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.
- In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of www.block360.pro (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner.
- The updated list of these parties may be requested from the Owner at any time.

LEGAL BASIS OF PROCESSING

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

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

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



PLACE

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

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

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

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

RETENTION TIME

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

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner
- The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn
- Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority

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

THE PURPOSES OF PROCESSING

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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:

- Managing support and contact requests
- Contacting the User
- Analytics
- · Remarketing and behavioral targeting
- · Location-based interactions
- Traffic optimization and distribution
- SPAM protection
- · Social features
- · Managing contacts and sending messages
- · Infrastructure monitoring

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

DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

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

Analytics

• Google Analytics (Google LLC)

Google Analytics is a web analysis service provided by Google LLC. Google utilizes the Data collected to track and examine the use of www.block360.pro, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

- Personal Data collected: Cookies and Usage Data
- Place of processing: United States Privacy Policy Opt Out. Privacy Shield participant

• Facebook Ads conversion tracking (Meta Platforms, Inc.)

Facebook Ads conversion tracking is an analytics service provided by Meta Platforms, Inc. that connects data from the Facebook advertising network with actions performed on www.block360.pro.

- Personal Data collected: Cookies and Usage Data
- Place of processing: United States Privacy Policy. Privacy Shield participant

• Twitter Ads conversion tracking (Twitter, Inc.)

Twitter Ads conversion tracking is an analytics service provided by Twitter, Inc. that connects data from the Twitter advertising network with actions performed on www.block360.pro.

- Personal Data collected: Cookies and Usage Data
- Place of processing: United States Privacy Policy. Privacy Shield participant

Contacting the User

• Contact form (<u>www.block360.pro</u>)

By filling in the contact form with their Data, the User authorizes www.block360.pro 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

Mailing list or newsletter (<u>www.block360.pro</u>)

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 www.block360.pro. Your email address might also be added to this list as a result of signing up to www.block360.pro or after making a purchase.

• Personal Data collected: email address



Infrastructure monitoring

• Splunk MINT Express (Splunk Inc.)

Splunk MINT Express is a monitoring service provided by Splunk Inc.

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

• Place of processing: United States - Privacy Policy

Location-based interactions

Non-continuous geolocation (<u>www.block360.pro</u>)

<u>www.block360.pro</u> 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 <u>www.block360.pro</u>.

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 collected: geographic position

MANAGING CONTACTS AND SENDING MESSAGES

• Sendgrid (Twilio Inc.)

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

- Personal Data collected: email address and username
- Place of processing: United States Privacy Policy

• Mailgun (Mailgun Technologies, Inc.)

Mailgun is an email address management and message sending service provided by Mailgun Technologies, Inc.

- Personal Data collected: email address and various types of Data
- Place of processing: United States Privacy Policy. Privacy Shield participant

• Twilio (Twilio, Inc.)

Twilio is a phone numbers management and communication service provided by Twilio, Inc.

- Personal Data collected: phone number
- Place of processing: United States Privacy Policy

MANAGING SUPPORT AND CONTACT REQUESTS

This type of service allows <u>www.block360.pro</u> to manage support and contact requests received via email or by other means, such as the contact form. The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

• Zendesk (Zendesk, Inc.)

Zendesk is a support and contact request management service provided by Zendesk Inc.

- Personal Data collected: various types of Data as specified in the privacy policy of the service
- Place of processing: United States Privacy Policy. Privacy Shield participant

REMARKETING AND BEHAVIORAL TARGETING

This type of service allows <u>www.block360.pro</u> and its partners to inform, optimize and serve advertising based on past use of <u>www.block360.pro</u> 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 by visiting the Network Advertising Initiative opt-out page.

• Facebook Remarketing (Meta Platforms, Inc.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of www.block360.pro with the Facebook advertising network.

- Personal Data collected: Cookies and Usage Data
- Place of processing: United States Privacy Policy Opt Out. Privacy Shield participant

• Twitter Remarketing (Twitter, Inc.)

Twitter Remarketing is a remarketing and behavioral targeting service provided by Twitter, Inc. that connects the activity of www.block360.pro with the Twitter advertising network.

- Personal Data collected: Cookies and Usage Data
- Place of processing: United States Privacy Policy Opt Out. Privacy Shield participant

• Google Ads Remarketing (Google LLC)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of www.block360.pro with the Google Ads advertising network and the DoubleClick Cookie.

- Personal Data collected: Cookies and Usage Data
- Place of processing: United States Privacy Policy Opt Out. Privacy Shield participant

SOCIAL FEATURES

Public profile (www.block360.pro)

Users may have public profiles that other Users can display. In addition to the Personal Data provided, this profile may contain Users' interactions with www.block360.pro.

Personal Data collected: City, email address, Geographic position, picture and username

SPAM PROTECTION

This type of service analyzes the traffic of www.block360.pro, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

• Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC. The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

- Personal Data collected: Cookies and Usage Data
- Place of processing: United States Privacy Policy. Privacy Shield participant

TRAFFIC OPTIMIZATION AND DISTRIBUTION

This type of service allows www.block360.pro 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 www.block360.pro and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information User are transferred.

• Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through www.block360.pro, i.e., communication between www.block360.pro and the User's browser, while also allowing analytical data from www.block360.pro to be collected.

- Personal Data collected: Cookies and various types of Data as specified in the privacy policy of the service
- Place of processing: United States Privacy Policy



THE RIGHTS OF USERS

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following:

- · Withdraw their consent at any time
- Object to Processing of their Data
- · Access their Data
- · Verify and seek rectification
- · Restrict the processing of their Data
- · Have their Personal Data deleted or otherwise removed
- · Receive their Data and have it transferred to another controller
- Lodge a complaint

Details about the right to object to processing

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

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification.

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.

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 www.block360.pro 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, www.block360.pro 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, <u>www.block360.pro</u> and any third-party services may collect files that record interaction with <u>www.block360.pro</u> (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

<u>www.block360.pro</u> 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 www.block360.pro 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 www.block360.pro (or third-party services employed in www.block360.pro), which can include:

- the IP addresses or domain names of the computers utilized by the Users who use www.block360.pro
- 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
- other parameters about the device operating system and/or the User's IT environment

User

The individual using www.block360.pro 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)

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 www.block360.pro. The Data Controller, unless otherwise specified, is the Owner of www.block360.pro. (or this Application)

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

Service

The service provided by www.block360.pro 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 www.block360.pro, if not stated otherwise within this document.

Latest update: April 2, 2025