

Privacy Policy of **Zwap**

Website domain: zwap.in

Zwap collects some Personal Data from its Users.

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

Owner and Data Controller

Zwap srl, Lungomare Dante, 36

Owner contact email: hello@zwap.in

Types of Data collected

Among the types of Personal Data that Zwap collects, by itself or through third parties, there are: Tracker; Usage Data; username; password; Data communicated while using the service; device information; email address; first name; last name; User ID; phone number; date of birth; profession; various types of Data; city; website; gender; geographic position; country; picture.

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 Zwap.

Unless specified otherwise, all Data requested by Zwap is mandatory and failure to provide this Data may make it impossible for Zwap to provide its services. In cases where Zwap 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 Zwap or by the owners of third-party services used by Zwap 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 Zwap 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 Zwap (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.

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.

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 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 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: Registration and authentication, Access to third-party accounts, User database management, Hosting and backend infrastructure, Analytics, Contacting the User, Advertising, Remarketing and behavioral targeting, Social features and Tag Management.

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".

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 Zwap to access Data from your account on a third-party service and perform actions with it.

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

Twitter account access (Twitter, Inc.)

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

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

Place of processing: United States – Privacy Policy.

Linkedin account access (LinkedIn Corporation)

This service allows Zwap to connect with the User's account on LinkedIn, provided by LinkedIn Corporation.

Personal Data processed: Tracker; Usage Data.

- **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 Zwap, 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 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 Zwap. For more information, please check the privacy policies of the relevant services. In addition to any opt-out feature offered by any of the services below, Users may opt out 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.

6sense (6Sense Insights, Inc.)

6sense is an advertising service provided by 6Sense Insights, Inc. Personal Data processed: Tracker; Usage Data. Place of processing: United States – Privacy Policy.

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 Zwap 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 cookies for ads personalization by visiting this opt-out page.

Personal Data processed: Tracker; Usage Data. Place of processing: Ireland – Privacy Policy – Opt Out.

Google Ad Manager (Google Ireland Limited)

Google Ad Manager is an advertising service provided by Google Ireland Limited that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with. In order to opt out from being tracked by various advertising networks, Users may make use of Youronlinechoices. In order to understand Google's use of data, consult Google's partner policy.

This service uses the “DoubleClick” Cookie, which tracks use of Zwap and User behavior concerning ads, products and services offered. Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – Privacy Policy.

Google Ads Similar audiences (Google Ireland Limited)

Similar audiences is an advertising and behavioral targeting service provided by Google Ireland Limited that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of Zwap.

On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences. Users who don't want to be included in Similar audiences can opt out and disable the use of advertising cookies by going to: Google Ad Settings.

Personal Data processed: Tracker; Usage Data.

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

- **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 Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of Zwap, 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 processed: Tracker; Usage Data.

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

Facebook Ads conversion tracking (Facebook pixel) (Facebook Ireland Ltd)

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

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – Privacy Policy.

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 Zwap.

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – Privacy Policy.

MixPanel (MixPanel)

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data processed: Tracker; Usage Data. Place of processing: United States – Privacy Policy – Opt Out.

- **Contacting the User**

Contact form (Zwap)

By filling in the contact form with their Data, the User authorizes Zwap 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; date of birth; email address; first name; last name; profession; various types of Data; website.

Mailing list or newsletter (Zwap)

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

Personal Data processed: city; country; date of birth; email address; first name; last name; Usage Data.

- **Hosting and backend infrastructure**

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

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: Italy – Privacy Policy.

- **Registration and authentication**

By registering or authenticating, Users allow Zwap 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, Zwap 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.

Google OAuth (Google Ireland Limited)

Google OAuth is a registration and authentication service provided by Google Ireland Limited 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: Ireland – Privacy Policy.

Linkedin OAuth (LinkedIn Corporation)

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

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

Place of processing: United States – Privacy Policy.

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 relay address on behalf of Users that automatically forwards messages to their verified personal email account - therefore shielding their actual email address from the Owner.

Personal Data processed: email address; first name; last name; phone number; User ID.

Place of processing: United States – Privacy Policy.

- **Remarketing and behavioral targeting**

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

In addition to any opt-out feature provided by any of the services below, Users may opt out 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 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 Zwap 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 processed: email address; Tracker.

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

Remarketing with Google Analytics (Google Ireland Limited)

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google Ireland Limited that connects the tracking activity performed by Google Analytics and its Cookies with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Tracker; Usage Data.

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

Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google Ireland Limited that connects the activity of Zwap with the Google Ads advertising network and the DoubleClick Cookie. Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.

Personal Data processed: Tracker; Usage Data.

Place of processing: 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 Zwap with the LinkedIn advertising network.

Personal Data processed: Tracker; Usage Data.

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

- **Content performance and features testing (A/B testing)**

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

Google Optimize (Google Ireland Limited)

Google Optimize is an A/B testing service provided by Google Ireland Limited ("Google"). Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – Privacy Policy.

- **Social features**

Public profile (Zwap)

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

Personal Data processed: city; country; date of birth; email address; first name; gender; geographic position; last name; picture; profession; username.

Inviting and suggesting friends (Zwap)

Zwap 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 Zwap 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 processed: Usage Data.

Place of processing: Ireland – Privacy Policy.

- **User database management**

This type of service helps the Owner to manage the tags or scripts needed on Zwap 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 processed: Usage Data.

Place of processing: Ireland – Privacy Policy.

- **Google API**

Google API services allow users signup and login on the platform. Zwap will ask to access Google data, about the Google Contacts API and Google Calendar API.

Through Google Contacts API Zwap will retrieve the contacts and other contacts of users.

Through Google Calendar API Zwap will schedule meeting calls whenever a user books a slot event on Zwap's calendar matching system.

Zwap stores the access of the google account on a backend platform to access the API's call without asking every time the permissions to the users.

Further information about Personal Data

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

The Owner may use the Personal and Usage Data collected through Zwap 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.

- **Access the address book**

Zwap may request access to your address book.

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.

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. 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. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Cookie Policy

Zwap uses Trackers. To learn more, the User may consult the Cookie Policy.

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 Zwap 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, Zwap 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, Zwap and any third-party services may collect files that record interaction with Zwap (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

Zwap 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 notifying its Users on this page and possibly within Zwap 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 Zwap (or third-party services employed in Zwap), which can include: the IP addresses or domain names of the computers utilized by the Users who use Zwap, 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 Zwap 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 Zwap. The Data Controller, unless otherwise specified, is the Owner of Zwap.

Zwap (or this Application)

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

Service

The service provided by Zwap 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 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 Zwap, if not stated otherwise within this document.

Latest update: June 18, 2021