

Privacy Policy of BoldStratus C3

BoldStratus C3 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

BoldStratus Inc.

Owner contact email: privacy@boldstratus.com

Types of Data collected

Among the types of Personal Data that BoldStratus C3 collects, by itself or through third parties, there are: device information; username; first name; last name; email address; Data communicated while using the service; various types of Data; Trackers; Microphone permission, without recording; geographic position; Usage Data; diagnostics; product interaction; search history; Universally unique identifier (UUID).

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 BoldStratus C3.

Unless specified otherwise, all Data requested by BoldStratus C3 is mandatory and failure to provide this Data may make it impossible for BoldStratus C3 to provide its services. In cases where BoldStratus C3 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 BoldStratus C3 or by the owners of third-party services used by BoldStratus C3 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 BoldStratus C3 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 BoldStratus C3 (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: Access to third-party accounts, Device permissions for Personal Data access, Hosting and backend infrastructure, Location-based interactions, Platform services and hosting, Registration and authentication and User database 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".

Device permissions for Personal Data access

Depending on the User's specific device, BoldStratus C3 may request certain permissions that allow it to access the User's device Data as described below.

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

The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of BoldStratus C3.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e. accessed to, modified or removed) by BoldStratus C3.

Microphone permission, without recording

Allows accessing and recording microphone audio from the User's device. The recording feature is not used on BoldStratus C3.

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 BoldStratus C3 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.

Dropbox account access (Dropbox, Inc.)

This service allows BoldStratus C3 to connect with the User's account on Dropbox, provided by Dropbox, Inc.

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

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

Google Drive account access (Google LLC)

This service allows BoldStratus C3 to connect with the User's account on Google Drive, provided by Google LLC.

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

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

OneDrive account access (Microsoft Corporation)

This service allows BoldStratus C3 to connect with the User's account on OneDrive, provided by Microsoft Corporation.

Personal Data processed: Trackers; various types of Data.

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

Device permissions for Personal Data access

BoldStratus C3 requests certain permissions from Users that allow it to access the User's device Data as described below.

Device permissions for Personal Data access (BoldStratus C3)

BoldStratus C3 requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Microphone permission, without recording.

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable BoldStratus C3 to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of BoldStratus C3.

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

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

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

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

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

Google Cloud Storage (Google LLC)

Google Cloud Storage is a hosting 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](#).

Location-based interactions

Geolocation (BoldStratus C3)

BoldStratus C3 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 BoldStratus C3.

Personal Data processed: geographic position.

Platform services and hosting

These services have the purpose of hosting and running key components of BoldStratus C3, therefore allowing the provision of BoldStratus C3 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.

App Store Connect (Apple Inc.)

BoldStratus C3 is distributed on Apple's App Store, a platform for the distribution of mobile apps, provided by Apple Inc.

App Store Connect enables the Owner to manage BoldStratus C3 on Apple's App Store. Depending on the configuration, App Store Connect provides the Owner with analytics data on user engagement and app discovery, marketing campaigns, sales, in-app purchases, and payments to measure the performance of BoldStratus C3. App Store Connect only collects such data from Users who have agreed to share them with the Owner. Users may find more information on how to opt out via their device settings [here](#).

Personal Data processed: diagnostics; product interaction; search history; Universally unique identifier (UUID); Usage Data.

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

Google Play Store (Google LLC)

BoldStratus C3 is distributed on the Google Play Store, a platform for the distribution of mobile apps, provided by Google LLC.

By virtue of being distributed via this app store, Google collects usage and diagnostics data and share aggregate information with the Owner. Much of this information is processed on an opt-in basis.

Users may opt-out of this analytics feature directly through their device settings. More information on how to manage analysis settings can be found on [this page](#).

Personal Data processed: Usage Data.

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

Registration and authentication

By registering or authenticating, Users allow BoldStratus C3 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, BoldStratus C3 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.

Dropbox OAuth (Dropbox, Inc.)

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

Personal Data processed: Trackers; various types of Data.

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](#).

OneDrive OAuth (Microsoft Corporation)

OneDrive OAuth is a registration and authentication service provided by Microsoft Corporation and is connected to the OneDrive network.

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

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

Login with Amazon (Amazon)

Login with Amazon is a registration and authentication service provided by Amazon.com, Inc.

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

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

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to BoldStratus C3, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving BoldStratus C3.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on BoldStratus C3.

Intercom (Intercom Inc.)

Intercom is a User database management service provided by Intercom Inc.

Intercom can also be used as a medium for communications, either through email, or through messages within BoldStratus C3. Intercom Messenger may use Trackers to recognize and track Users behavior.

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

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

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may follow the instructions provided by [YourOnlineChoices](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-

based advertising on mobile apps.

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.

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.

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 BoldStratus C3 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, BoldStratus C3 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, BoldStratus C3 and any third-party services may collect files that record interaction with BoldStratus C3 (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

BoldStratus C3 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 BoldStratus C3 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 BoldStratus C3 (or third-party services employed in BoldStratus C3), which can include: the IP addresses or domain names of the computers utilized by the Users who use BoldStratus C3, 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 BoldStratus C3 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 BoldStratus C3. The Data Controller, unless otherwise specified, is the Owner of BoldStratus C3.

BoldStratus C3 (or this Application)

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

Service

The service provided by BoldStratus C3 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 BoldStratus C3, if not stated otherwise within this document.

Latest update: July 28, 2022