

Privacy Policy of www.lantrns.com

www.lantrns.com collects some Personal Data from its Users.

Data controller

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Types of data collected

Among the Personal Data collected by www.lantrns.com, either independently or through third parties, are: Data of usage; Tracking Tools; number of Users; city; device information; session statistics sessions; latitude (of city); longitude (of city); browser information; first name; last name; email; username; password; country; gender; date of birth.

Full details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific informational texts displayed prior to the collection of such data. Personal Data may be freely provided by the User or, in the case of Usage Data, automatically collected during the use of www.lantrns.com.

Unless otherwise specified, all Data requested by www.lantrns.com are mandatory. If the User refuses to provide them, it may be impossible for www.lantrns.com to provide the Service. In cases where www.lantrns.com indicates certain Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or its operation. Users in doubt as to which Data are mandatory are encouraged to contact the Data Controller. Any use of Cookies - or other tracking tools - by www.lantrns.com or the owners of third-party services used by www.lantrns.com, unless otherwise specified, is for the purpose of providing the Service requested by the User, in addition to the additional purposes described in this document and in the Cookie Policy, if available.

The User assumes responsibility for the Personal Data of third parties obtained, published or shared through www.lantrns.com and guarantees that he/she has the right to communicate or disseminate it, releasing the Owner from any liability towards third parties.

Method and place of processing of collected Data

Methods of processing

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

The processing is carried out by means of computer and/or telematic tools, with organizational methods and logics strictly related to the indicated purposes. In addition to the Data Controller, in some cases, other subjects involved in the organization of www.lantrns.com (administrative, sales, marketing, legal, system administrators) or external subjects (such as third-party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, Data Processors by the Data Controller may have access to the Data. The updated list of Data Processors can always be requested from the Data Controller.

Legal basis for processing

The Owner processes Personal Data related to the User if one of the following conditions exists:

- The User has given consent for one or more specific purposes; Note: In some jurisdictions the Data Controller may be authorized to process Personal Data without the need for the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") to such processing. However, this does not apply if the processing of Personal Data is governed by the European legislation on the protection of Personal Data;
- the processing is necessary for the performance of a contract with the User and/or the execution of measures pre-contractual measures;
- the processing is necessary for the performance of a legal obligation to which the Controller is subject;

- the processing is necessary for the performance of a task of public interest or for the exercise of public powers vested in the Controller;
- processing is necessary for the pursuit of the legitimate interest of the Controller or third parties.

However, it is always possible to ask the Data Controller to clarify the concrete legal basis of processing and in particular to specify whether the processing is based on law, required by a contract or necessary to conclude a contract.

Place

The Data are processed at the Holder's operational offices and at any other location where the parties involved in the processing are located. For more information, please contact the Data Controller.

The User's Personal Data may be transferred to a country other than the country where the User is located. To obtain more information about the location of the processing, the User may refer to the section on Personal Data processing details.

The User has the right to obtain information regarding the legal basis for the transfer of Data outside the European Union or to an international organization under public international law or consisting of two or more countries, such as the UN, as well as regarding the security measures taken by the Data Controller to protect the Data.

The User may verify whether any of the transfers just described takes place by reviewing the section of this document on details of the processing of Personal Data or request information from the Data Controller by contacting it at the contact details given at the beginning.

Storage Period

Data are processed and kept for the time required by the purposes for which they were collected. Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Data Controller and the User will be retained until the performance of that contract is completed.
- Personal Data collected for purposes attributable to the legitimate interest of the Data Controller will be retained until such interest is satisfied. The User may obtain further information regarding the legitimate interest pursued by the Controller in the relevant sections of this document or by contacting the Controller.

When processing is based on the User's consent, the Controller may retain Personal Data longer until that consent is revoked. In addition, the Controller may be required to retain Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the Personal Data will be deleted. Therefore, at the expiration of this period the right of access, deletion, rectification and the right to Data portability can no longer be exercised.

Purposes of the Processing of Collected Data

User Data is collected to enable the Owner to provide the Service, comply with legal obligations, respond to requests or enforcement actions, protect its rights and interests (or those of Users or third parties), detect any malicious or fraudulent activities, as well as for the following purposes: Tag Management, Statistics, Registration and Authentication, Hosting and Backend Infrastructure, Content and Functionality Performance Testing (A/B testing), Contacting the User, and Displaying Content from External Platforms.

To obtain detailed information about the purposes of the processing and the Personal Data processed for each purpose, the User may refer to the section "Personal Data Processing Details".

Details of the processing of Personal Data

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

Contact User

Mailing list or newsletter (www.lantrns.com)

By registering for the mailing list or newsletter, the User's email address is automatically added to a list of contacts to whom email messages containing information, including information of a commercial and promotional nature, relating to www.lantrns.com may be sent. The User's email address may also be added to this list as a result of registering at www.lantrns.com or after making a purchase.

Personal Data Processed: last name; date of birth; email; country; first name; gender; Tracking Tools.

Category of personal information collected under the CCPA: identifiers; Internet information.

This type of processing constitutes:

- a sale under the CCPA and the VCDPA.

Tag management

This type of services is functional for the centralized management of tags or scripts used on www.lantrns.com. The use of such services involves the flow of User Data through them and, where appropriate, their retention.

Google Tag Manager

Google Tag Manager is a tag management service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data.

Personal Data Processed: Usage Data; Tracking Tools.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

Hosting and backend infrastructure

These types of services have the function of hosting Data and files that allow www.lantrns.com to function, enable its distribution, and provide a ready-to-use infrastructure to deliver specific www.lantrns.com features.

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

Firestore Realtime Database

Firestore Realtime Database is a hosting and backend service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data.

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

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of Personal Information collected under the CCPA: identifiers; Internet information.

Firestore Cloud Storage (Google LLC)

Firestore Cloud Storage is a hosting service provided by Google LLC.

Personal Data Processed: Usage Data; various types of Data as specified by the service's privacy policy.
Place of processing: Belgium - Privacy Policy.

Category of personal information collected under the CCPA: identifiers; Internet information.

Registration and Authentication.

By registration or authentication, the User allows www.lantrns.com to identify him/her and give him/her access to dedicated services.

Depending on what is indicated below, registration and authentication services may be provided with the help of third parties. If this occurs, www.lantrns.com may access some Data stored by the third-party service used for registration or identification.

Some of the services below may also collect Personal Data for targeting and profiling purposes; please refer to the description of each service to learn more.

Firebase Authentication

Firebase Authentication is a registration and authentication service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data. To simplify the registration and authentication process, Firebase Authentication may use third-party identity providers and store the information on its platform.

Personal Data processed: last name; email; first name; password; username.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: identifiers.

This type of processing constitutes:

- A sale under the CCPA and the VCDPA.

Statistics

The services contained in this section allow the Data Controller to monitor and analyze traffic data and serve to track User behavior.

Google Analytics 4

Google Analytics is a statistics service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data, ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of www.lantrns.com, compiling reports and sharing them with other services developed by Google.

Google may use Personal Data to contextualize and personalize ads in its ad network.

In Google Analytics 4, IP addresses are used at the time of collection and then deleted before the data is recorded in any data center or server. To learn more, you can consult Google's official documentation.

Personal Data Processed: city; Usage Data; browser information; device information; latitude (of city); longitude (of city); number of Users; session statistics; Tracking Tools.

Place of Processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Category of personal information collected under the CCPA: identifiers; Internet information; geolocation data.

This type of processing constitutes:

- A sale under the CCPA and VCDPA.

Performance testing of content and functionality (A/B testing).

The services contained in this section allow the Data Controller to track and analyze the response from the User, in terms of traffic or behavior, in relation to changes in the structure, text or any other component of www.lantrns.com.

Firebase Remote Config

Firebase Remote Config is an A/B testing and configuration service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data.

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

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: identifiers. This type of processing constitutes:

- A sale under the CCPA and the VCDPA.

Viewing content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of www.lantrns.com and interact with them. This type of service may still collect web traffic data related to the pages where the service is installed, even when users are not using it.

Google Fonts

Google Fonts is a font style display service operated by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data, which allows www.lantrns.com to integrate such content within its pages.

Personal Data Processed: Usage Data; Tracking Tools.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes:

- A sale under the CCPA and the VCDPA.

User Rights

Users may exercise certain rights with respect to Data processed by the Data Controller.

In particular, to the extent permitted by law, the User has the right to:

- revoke consent at any time. The User may revoke the consent to the processing of its Personal Data previously expressed.
- object to the processing of their Data. The User may object to the processing of its Data when it is done on a legal basis other than consent. Further details on the right to object are provided in the section below.
- access to one's own Data. The User has the right to obtain information about the Data processed by the Data Controller, certain aspects of the processing and to receive a copy of the Data processed.
- verify and request rectification. The User may verify the correctness of its Data and request that it be updated or corrected.
- obtain restriction of processing. The User may request the limitation of the processing of its Data. In this case, the Data Controller will not process the Data for any purpose other than its preservation.
- obtain the deletion or removal of their Personal Data. The User may request the deletion of their Data by the Data Controller.
- receive their Data or have it transferred to another Data Controller. The User has the right to receive its Data in a structured, commonly used and machine-readable format and, where technically feasible, to have it transferred unimpeded to another data controller.
- propose Complaint. The User may lodge a complaint with the relevant data protection supervisory authority or take legal action.

Details on the right to object

When Personal Data are processed in the public interest, in the exercise of public powers vested in the Data Controller or in pursuit of a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons related to their particular situation.

Users should note that if their Data were processed for direct marketing purposes, they may object to the processing at any time, free of charge and without providing any reasons. If Users object to processing for direct marketing purposes, Personal Data are no longer processed for such purposes. To find out whether the Data Controller processes Data for direct marketing purposes, Users may refer to the respective sections of this document.

How to Exercise Rights

To exercise their rights, Users may address a request to the Controller's contact details set out in this document. The request may be filed free of charge and the Holder will respond as soon as possible, in any case within one month, providing the User with all the information required by law. Any rectification, deletion or restriction of processing will be communicated by the Controller to each of the recipients, if any, to whom the Personal Data has been transmitted, unless this proves impossible or involves a disproportionate effort. The Controller shall notify the User of such recipients if the User so requests.

Cookie Policy

www.lantrns.com makes use of Tracking Tools. To learn more, the User may consult the Cookie Policy.

Additional information on treatment

Defense in Court

The User's Personal Data may be used by the Owner in court or in the preparatory stages of its possible establishment for the defense against abuse in the use of www.lantrns.com or related Services by the User.

The User declares that he/she is aware that the Data Controller may be obliged to disclose the Data by order of public authorities.

Specific disclosures

Upon the User's request, in addition to the information contained in this privacy policy, www.lantrns.com may provide the User with additional and contextual disclosures regarding specific Services, or the collection and processing of Personal Data.

System Logs and Maintenance

For operation and maintenance purposes, www.lantrns.com and any third-party services it uses may collect system logs, i.e., files that record interactions and may also contain Personal Data, such as the User's IP address.

Information not contained in this policy

Further information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact details.

Response to "Do Not Track" Requests

www.lantrns.com does not support "Do Not Track" requests.

To find out whether any third-party services used support them, the User is encouraged to consult their respective privacy policies.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if possible, on www.lantrns.com as well as, if technically and legally feasible, by sending a notification to Users through one of the contact details it has. Therefore, please consult this page frequently, referring to the date of last modification indicated at the bottom.

Where changes affect processing whose legal basis is consent, the Controller will re-collect the User's consent as necessary.

Information for Californian consumers

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running www.lantrns.com and, if the case may be, its parents, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The provisions contained in this section apply to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the state of California, United States of America, according to the "California Consumer Privacy Act of 2018" (the "CCPA"), as updated by the "California Privacy Rights Act" (the "CPRA") and subsequent regulations. For such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the terms "personal information" (and "sensitive personal information") as

defined in the California Consumer Privacy Act (CCPA).

Notice at collection

Categories of personal information collected, used, sold, or shared

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. **You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.**

Information we collect: the categories of personal information we collect

We have collected the following categories of personal information about you: identifiers, internet information and geolocation data.

We have collected the following categories of sensitive personal information: username and password

We will not collect additional categories of personal information without notifying you.

Your right to limit the use or disclosure of your sensitive personal information and how you can exercise it

You have the right to request that we limit the use or disclosure of your sensitive personal information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer.

We can also use your sensitive personal information to perform specific purposes set forth by the law (such as, including but not limited to, helping to ensure security and integrity; undertaking activities to verify or maintain the quality or safety of our service) and as authorized by the relevant regulations.

Outside of the aforementioned specific purposes, you have the right to freely request, at any time, that we do not use or disclose your sensitive personal information. This means that whenever you ask us to stop using your sensitive personal information, we will abide by your request and we will instruct our service providers and contractors to do the same.

To fully exercise your right to limit the use or disclosure of your sensitive personal information you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on www.lantrns.com.

We use any personal information collected from you in connection with the submission of your request solely for the purposes of complying with the request.

Once you have exercised this right, we are required to wait at least 12 months before asking whether you have changed your mind.

What are the purposes for which we use your personal information?

We may use your personal information to allow the operational functioning of www.lantrns.com and features thereof (“business purposes”). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section “Detailed information on the processing of Personal Data” within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

How long do we keep your personal information?

Unless stated otherwise inside the “Detailed information on the processing of Personal Data” section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

How we collect information: what are the sources of the personal information we collect?

We collect the above-mentioned categories of personal information, either directly or indirectly, from you when you use www.lantrns.com.

For example, you directly provide your personal information when you submit requests via any forms on www.lantrns.com. You also provide personal information indirectly when you navigate www.lantrns.com, as personal information about you is automatically observed and collected.

Finally, we may collect your personal information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

How we use the information we collect: disclosing of your personal information with third parties for a business

purpose

For our purposes, the word “third party” means a person who is not any of the following: a service provider or a contractor, as defined by the CCPA.

We disclose your personal information with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

Sale or sharing of your personal information

For our purposes, the word “sale” means any “selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer’s personal information by the business to a **third party, for monetary or other valuable consideration**”, as defined by the CCPA.

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

For our purposes, the word “sharing” means any “sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged”, as defined by the CCPA.

Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CCPA, does not constitute a sale or sharing of your personal information.

Your right to opt out of the sale or sharing of your personal information and how you can exercise it

We sell or share your personal information with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

You have the right to opt out of the sale or sharing of your personal information. This means that whenever you request us to stop selling or sharing your personal information, we will abide by your request. Such requests can be made freely, at any time, without submitting any verifiable request.

To fully exercise your right to opt out, you can contact us at any time using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on www.lantrns.com.

If you want to submit requests to opt out of the sale or sharing of personal information via a user-enabled global privacy control, like the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a [participating browser](#) or browser extension. More information about downloading GPC is available [here](#).

We use any personal information collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

What are the purposes for which we use your personal information?

We may use your personal information to allow the operational functioning of www.lantrns.com and features thereof (“business purposes”). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section “Detailed information on the processing of Personal Data” within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

How long do we keep your personal information?

Unless stated otherwise inside the “Detailed information on the processing of Personal Data” section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

Your privacy rights under the California Consumer Privacy Act and how to exercise them

The right to access personal information: the right to know and to portability

You have the right to request that we disclose to you:

- the categories of personal information that we collect about you;
- the sources from which the personal information is collected;
- the purposes for which we use your information;
- to whom we disclose such information;
- the specific pieces of personal information we have collected about you.

You also have **the right to know what personal information is sold or shared and to whom**. In particular, you have the right to request two separate lists from us where we disclose:

- the categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared;
- the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance – provided that this is technically feasible.

The right to request the deletion of your personal information

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on www.lantrns.com, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and notify any of our service providers and all third parties to whom we have sold or shared the personal information to do so – provided that this is technically feasible and doesn't involve disproportionate effort.

The right to correct inaccurate personal information

You have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

The right to opt out of sale or sharing of personal information and to limit the use of your sensitive personal information

You have the right to opt out of the sale or sharing of your personal information. You also have the right to request that we limit our use or disclosure of your sensitive personal information.

The right of no retaliation following opt-out or exercise of other rights (the right to non-discrimination)

We will not discriminate against you for exercising your rights under the CCPA. This means that we will not discriminate against you, including, but not limited to, by denying goods or services, charging you a different price, or providing a different level or quality of goods or services just because you exercised your consumer privacy rights.

However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction.

To the extent permitted by the law, we may offer you promotions, discounts, and other deals in exchange for collecting, keeping, or selling your personal information, provided that the financial incentive offered is reasonably related to the value of your personal information.

How to exercise your rights

To exercise the rights described above, you need to submit your verifiable request to us by contacting us via the details provided in this document.

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will use any personal information collected from you in connection with the verification of your request solely for the purposes of verification and shall not further disclose the personal information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

If you are an adult, you can make a verifiable request on behalf of a minor under your parental authority.

You can submit a maximum number of 2 requests over a period of 12 months.

How and when we are expected to handle your request

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period. Only with regard to personal information collected on or after January 1, 2022, you have the right to request that we disclose information beyond the 12-month period, and we will provide them to you unless doing so proves impossible or would involve a disproportionate effort.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind it.

Information for Virginia consumers

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The provisions contained in this section apply to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the Commonwealth of Virginia, according to the [“Virginia Consumer Data Protection Act”](#) (the “VCDPA”), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the VCDPA.

Categories of personal data processed

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on**

the processing of Persona Data” within this document.

Categories of personal data we collect

We have collected the following categories of personal data: identifiers, internet information and geolocation data

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

Why we process your personal data

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

How we use the data we collect: sharing of your personal data with third parties

We share your personal data with the third parties listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a natural or legal person, public authority, agency, or body other than the consumer, controller, processor, or an affiliate of the processor or the controller" as defined by the VCDPA.

Sale of your personal data

For our purposes, the word “sale” means any “exchange of personal data for monetary consideration by us to a third party“ as defined by the VCDPA.

Please note that according to the VCDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale.

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal information may be considered a sale under VCDPA.

Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

Processing of your personal data for targeted advertising

We do not process your personal data for targeted advertising. If we decide to do so, we will inform you beforehand and will grant your right to opt out of the processing of your personal data for targeted advertising.

Your privacy rights under the Virginia Consumer Data Protection Act and how to exercise them

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- **access personal data: the right to know.** You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- **correct inaccurate personal data.** You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- **request the deletion of your personal data.** You have the right to request that we delete any of your personal data.
- **obtain a copy of your personal data.** We will provide your personal data in a portable and usable

format that allows you to transfer data easily to another entity – provided that this is technically feasible.

- **opt out of the processing of your personal data for the purposes of targeted advertising** , the **sale of personal data** , or **profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **non-discrimination.** We will not discriminate against you for exercising your rights under the VCDPA. This means that we will not, among other things, deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your consumer privacy rights. However, if you refuse to provide your personal data to us or ask us to delete or stop selling your personal data, and that personal data or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction. To the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if you have exercised your right to opt out, or our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

How to exercise your rights

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relates to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a minor under your parental authority.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 60 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to two requests per year. If your request is manifestly unfounded, excessive or repetitive, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

Information for Users residing in Brazil

This part of the document supplements and complements the information contained in the rest of the privacy policy and is provided by the entity that operates www.lantrns.com and, where applicable, its parent company and its

subsidiaries and affiliates (for the purposes of this section collectively referred to as "we," "our," or "us"). The provisions contained in this section apply to all Users who are residents of Brazil, pursuant to terms of the "Lei Geral de Proteção de Dados" (such Users are hereinafter referred to simply as "you," "your," "you," or "your"). For such Users, these provisions prevail over any other provisions possibly divergent or conflicting provisions contained in this privacy policy. In this part of the document, the term "personal information" as defined by Lei Geral de Proteção de Dados (LGPD).

Legal basis under which we process your personal information

We process your personal information only where one of the legal bases for such processing. The legal bases are as follows:

- your consent to the processing activities in question;
- compliance with legal obligations that we are required to fulfill;
- the execution of rules dictated by laws or regulations or by contracts, agreements or other similar instruments legal;
- studies conducted by research organizations, preferably carried out on anonymized personal information;
- the performance of a contract and related pre-contractual obligations, if you are a party to that contract;
- the exercise of our rights in court, administrative proceedings or arbitrations;
- the defense or physical safety of you or a third party;
- the protection of health - in the context of procedures put in place by entities or professionals in the field of health;
- our legitimate interest, provided that your fundamental rights and freedoms do not override such interests; and
- credit protection.

To learn more about the legal basis, you can contact us at any time using the contact information provided in this document.

Categories of personal information processed

To find out what categories of personal information are processed, you can refer to the section "Details On the Processing of Personal Information" found in this document.

Why we process your personal information

To find out why we process your personal information, please refer to the sections "Details on the Processing of Personal Information" and "Purposes of the Processing of Data Collected" present in this document.

Your rights related to privacy in Brazil, how to submit a request, and how will be handled by us

Your rights related to privacy in Brazil

You have the right to:

- obtain confirmation of the existence of processing activities regarding your personal information;
- access your personal information;
- obtain rectification of your incomplete, inaccurate or outdated personal information;
- obtain the anonymization, blocking or deletion of unnecessary or excessive, or of that information that is processed contrary to the provisions of the LGPD;
- obtain information regarding the possibility of giving or withholding your consent and its consequences;
- obtain information regarding the third parties with whom we share your personal information;
- obtain, upon your explicit request, portability of your personal information (except for except anonymized information) to other providers of products or services, provided that our our trade and industry secrets are safeguarded;
- obtain the deletion of personal information processed if the processing was carried out based on your consent, unless one or more of the exceptions provided for in Article 16 LGPD;
- revoke your consent at any time;
- file a complaint regarding your personal information with the ANPD (National Authority for Data Protection) or to a consumer protection body;
- object to processing activities in cases where such processing is not carried out in accordance with the legal provisions;
- request clear and adequate information regarding the criteria and procedures used within the framework of automated decision-making processes; and
- request a review of decisions affecting your interests made solely on the basis of automated decision-making processes of your personal information. These include decisions to delineate your personal, professional, consumer or creditor profile, or other facets of your personality.

You will never be discriminated against, or suffer in any way any treatment that is unfavorable to you, as a result of the exercise of your rights.

How to submit a request

You can submit an explicit request to exercise your rights free of charge, at any time, using the contact information in this document or through your legal representative.

How and how quickly we will handle your request

We will make every effort to respond to your request as quickly as possible. In any case, if it is impossible for us to do so, we will be sure to inform you of the factual or legal reasons that prevent us from immediately fulfilling or following up on your request. In the event that your personal information is not processed by us, if we are able to do so, we will direct you to the individual or legal entity to whom your requests should be addressed.

In the event that you decide to submit a request for access or a request for confirmation of the existence processing of personal information, please be sure to specify whether you prefer to receive your personal information in electronic or paper format. You should also let us know if you would like an immediate response, in which case you will receive a simplified, or if you require a full disclosure instead. In the latter case, we will respond within 15 days from the time of your request, providing you with all the information regarding the origin of your personal information, confirmation or non-confirmation of the existence of personal information about you, all the criteria used for the processing and the purposes of such processing, while safeguarding our commercial and industrial secrets.

In the event that you decide to submit a request for rectification, erasure, anonymization or blocking personal information, we will be sure to immediately inform the other parties with whom we have shared your personal information so that they can in turn comply with your request - except in cases where such a disclosure would be impossible or unduly burdensome.

Transfer of personal information outside Brazil in cases permitted by law

We may transfer your personal information outside the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between services of intelligence, investigative and criminal procedure bodies, as provided by the instruments made available under international law;
- when the transfer is necessary to defend your life or physical safety or that of third parties;
- when the transfer is authorized by the ANPD;
- when the transfer results from an obligation undertaken in the context of an agreement of cooperation international;
- when the transfer is necessary for the exercise of public policy or the performance of a public service;
- when the transfer is necessary for the fulfillment of a legal obligation, the performance of a contract and related pre-contractual fulfillments, or the normal exercise of rights in judicial administrative or in arbitration.

Definitions and legal references

Personal Data (or Data)

Personal data constitutes any information that, directly or indirectly, including in connection with any other information, including a personal identification number, makes identified or identifiable a natural person.

Usage Data

This is the information collected automatically through www.lantrns.com (including by third party applications third parties integrated into www.lantrns.com), including: the IP addresses or domain names of the computers used by the User connecting with www.lantrns.com, the addresses in URI (Uniform Resource Identifier), the time of the request, the method used in forwarding the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (such as the time spent on each page) and details relating to the itinerary followed within the Application, with particular reference to the sequence of the pages consulted, the parameters relating to the operating system and the User's computer environment.

User

The individual who uses www.lantrns.com which, except where otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Controller (or Processor)

The natural person, legal entity, public administration and any other entity that processes Personal Data on behalf of the Data Controller, as set out in this privacy policy.

Data Controller (or Controller)

The natural or legal person, public authority, service or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data and the instruments adopted, including the security measures relating to the operation and use of www.lantrns.com. The Data Controller, unless otherwise specified, is the owner of www.lantrns.com.

www.lantrns.com (or this Application)

The hardware or software tool by which Users' Personal Data are collected and processed.

Service

The Service provided by www.lantrns.com as defined in the relevant terms (if any) on this site/application.

European Union (or EU)

Unless otherwise specified, any reference to the European Union in this document shall be deemed to extend to all current member states of the European Union and the European Economic Area.

Cookies

Cookies are Tracking Tools that consist of small portions of data stored within the User's browser.

Tracking Tool

Tracking Tool means any technology - e.g., Cookies, unique identifiers, web beacons, embedded scripts, e-tags, and fingerprinting - that enables tracking of Users, for example, by collecting or storing information on the User's device.

Legal references

This privacy policy is written on the basis of multiple legislative orders, including Articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy policy covers www.lantrns.com only.

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