

# Privacy Policy of TuneSend

The TuneSend application collects some Personal Data from its Users.

## **Policy summary**

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

- **Device permissions for Personal Data access**

Personal Data: Phone permission

## **Full policy**

### **Owner and Data Controller**

### **Types of Data collected**

Among the types of Personal Data that TuneSend collects, by itself or through third parties, there are: Phone permission.

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.

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

All Data requested by TuneSend is mandatory and failure to provide this Data may make it impossible for TuneSend to provide its services. In cases where TuneSend specifically states that some Data is not mandatory, Users are free not to communicate this Data without any consequences on 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 TuneSend or by the owners of third-party services used by TuneSend 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 TuneSend 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 Data Controller processes the Data of Users in a proper manner and shall take 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 Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (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 Data Controller at any time.

**Place**

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

**Retention time**

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

**The use of the collected Data**

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Device permissions for Personal Data access.

The Personal Data used for each purpose is outlined in the specific sections of this document.

**Device permissions for Personal Data access**

Depending on the User's specific device, TuneSend 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 TuneSend.

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

**Phone permission**

Used for accessing a host of typical features associated with telephony. This enables, for instance, read-only access to the "phone state", which means it enables access to the phone number of the device, current mobile network information, or the status of any ongoing calls.

**Detailed information on the processing of Personal Data**

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

- **Device permissions for Personal Data access**

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

**Device permissions for Personal Data access (TuneSend)**

TuneSend 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 collected: Phone permission.

**Additional information about Data collection and processing****Legal action**

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of TuneSend or the related services.

The User declares to be aware that the Data Controller 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, TuneSend 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, TuneSend and any third-party services may collect files that record interaction with TuneSend (System logs) or use for this purpose other Personal Data (such as IP Address).

#### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

#### **The rights of Users**

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons.

Requests should be sent to the Data Controller at the contact information set out above. TuneSend 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 Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using TuneSend and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

#### **Information about this privacy policy**

The Data Controller is responsible for this privacy policy, prepared starting from the modules provided by iubenda and hosted on iubenda's servers.

#### **Definitions and legal references**

##### **Personal Data (or Data)**

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

##### **Usage Data**

Information collected automatically from TuneSend (or third-party services employed in TuneSend), which can include: the IP addresses or domain names of the computers utilized by the Users who use TuneSend, 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 TuneSend, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

**Data Subject**

The legal or natural person to whom the Personal Data refers.

**Data Processor (or Data Supervisor)**

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

**Data Controller (or Owner)**

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of TuneSend. The Data Controller, unless otherwise specified, is the Owner of TuneSend.

**TuneSend**

The hardware or software tool by which the Personal Data of the User is collected.

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**Legal information**

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. 10 of EC Directive n. 95/46/EC, and under the provisions of Directive 2002/58/EC, as revised by Directive 2009/136/EC, on the subject of Cookies. This privacy policy relates solely to TuneSend.