**PRIVACY POLICY**

**Introductory provisions**

UnitedOver (hereinafter "Service", “we” or “us”) treats everything that is related to personal data with respect and integrity. We are committed to safeguarding the privacy of our website, of our products as data protection is of a particularly high priority for the management of our company.

It is very important for us to accurately inform the users of this website about our Privacy Policy, so in the following we provide you with precise information on what kind of data we collect from you, how we use it, for what purpose we use it and what your rights are, in this context.

First, we need to define, and it is important for you to understand, the expression: **"Personal Data"**. It generically represents any kind of information about a physical person, whose particularities can lead, directly or indirectly, to its identification. Here you have, by way of example, but not limited to: name and surname, geographical address, any identification number, political orientation, sexual orientation, email address, any location information and any other online identifier such as the device used to access the Internet, IP address, or cookie information.

With regards of your agreement regarding the collection and use of personal data, we have taken all the necessary technical measures to provide you with this detailed agreement, so you can have a crisp clear experience, from the first to the last interaction with our website or our products and services.

Visitors and customers agree and accept that the use of our website is not possible without any indication of personal data.

**Definitions**

Our data protection policy should be legible and understandable for the general public, as well as for our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

• **Data subject or Data principal** - is any identified or identifiable natural person, whose personal data is collected and processed by us.

• **Processing** - is any operation which is performed on personal data, such as collection, recording, organization, structuring, storage, etc.

• **Restriction of processing** - is the marking of stored personal data with the aim of limiting their processing in the future.

• **Profiling** - means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person.

• **Data controller or Data fiduciary** - is the natural or legal person, public authority, agency or other body, which determines the purposes and means of the processing of personal data;

• **Processor** - is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

• **Recipient** - is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed. The processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

• **Third party** - is a natural or legal person, public authority, agency or body other than the ones above, who, under the direct authority of the controller or processor, are authorized to process personal data.

• **Consent** - is any freely given, specific, informed and unambiguous indication of data subject’s acceptance to the processing of their personal data.

**Compliance**

The processing of personal data will be in line with these main legislations:

- General Data Protection Regulation (GDPR), applicable in Europe;

- California Consumer Privacy Act (2018) and Privacy Act U.S.C. 552a (Privacy Act of USA);

* Australian Privacy Principles contained in the Privacy Act 1988;
* Indian Personal Data Protection Bill (2018)

- Privacy Acts in Latin America;

- Any other country-specific data protection regulations applicable.

We sell our products world-wide. For the purpose of avoiding any compliance conflict with any terminology used by any particular legislation, in this document: ”**customers**” are the ”**data subjects**” or the ”**data principals**” and UnitedOver is the ”**data controller**” or ”**data fiduciary**”

**Our Privacy Policy explains:**

1. What Personal Data we collect and why we collect it

2. How we use Personal Data

3. Who we share Personal Data with

4. The choices we offer, including how to access, update, and remove Personal Data

By means of this data protection declaration, our company would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. This document describes the protection of our users and customers personal data.

UnitedOver collects, stores, uses and discloses certain information when the visitors use our website. As a data controller, we have implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website.

Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you will not receive direct marketing communications and will limit the publication of your information.

In your relationship with us through the website, controller, for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection, is:

Company name and address

This Policy does not apply to other companies’ or organizations’ sites to which we may link to or may link to us. You should carefully review the privacy policies of those sites in order to determine how they treat your personal information.

If you do not agree to this Privacy Policy, please exit, and do not access or use our website.

We have kept this simple for your understanding, but if you’re not familiar with terms like “cookies” or “IP addresses,” feel free to contact us. Your privacy is really important to us, so whether you’re new to UnitedOver or a long-time user, please take the time to get to know our practices.

**Use Cases**

Please take a moment to understand which use case(s) set out in this Privacy Policy apply to you:

● Website Visitor

You are a “Website Visitor” by definition when you visit our website https://UnitedOver.unitedover.com/ and any other eventual subdomains associated with our principal domain. As a website visitor, we use your information for our own purposes, primarily for improving the use of our website and to provide you with more relevant content.

● Customer

You become a “Customer” if you buy one of our products or services. If you are a customer, our primary purpose of using your personal data is for providing the product and the services to you. We retain your personal information for a limited time and for limited purposes, such as to make it easier for you to re-join our service in the future or to wish you offers for services that we think you may be interested in.

**What Personal Data we collect and how do we collect it**

All Personal Data that is collected through the use of the website is stored on secure servers in New York, USA, and also a part in India.

Upon acquisition of our products and services, we will ask for your full name and a valid e-mail address, which will be included in our emailing list, for future maintenance, updates, and eventual marketing promotions. In addition, we will ask you to provide us with secure payment data, which will be used for processing the order. This particular set of data will be legally processed by our payment processor, and will not be stored by us.

In this Section we have set out:

• the general categories of personal data that we may process;

• in the case of personal data that we did not obtain directly from our customers, the source and specific categories of that data;

• the purposes for which we may process personal data;

• the legal bases of the processing.

We may process data about your use of our website and services, or the customer’s website ("usage data"). The usage data may include your IP address, geographical location, browser type, and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analyzing the use of the website and services.

We may process your personal data that are provided in the course of the use of our services ("service data"). The service data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

We may process information contained in any inquiry you submit to us regarding products and/or services ("inquiry data"). The inquiry data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

We may process information relating to our customer relationships, including customer contact information ("customer relationship data"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The customer relationship data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our services ("transaction data"). The transaction data may include your contact details and the transaction details. The transaction data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

“Automatically Collected" Information: The website collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files, and it is collected regardless of your quality: Website Visitor or Customer.

**Note**: no personal information is collected through the product (plugin) itself. UnitedOver only collects purchase codes, website URL, plugin version and WordPress version strictly for providing services.

Collected may be:

• the ISP,

• the operating system used by the accessing system

• the website from which an accessing system reaches our website (so-called referrers)

• the sub-website

• the date and time of access to the website

• an Internet Protocol address (IP address)

• screen Resolution

• locale Preferences

• web page visited before you came to our website

• information you search for on our website

• date and time stamps associated with transactions

• system configuration information and other interactions with the website.

• social networking information (if we are provided with access to your account on social network connection services);

• any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, we do not draw any conclusions about the data subject. Rather, this information is needed to:

• deliver the content of our website correctly;

• optimize the content of our website as well as its advertisement;

• ensure the long-term viability of our information technology systems and website technology;

• provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack;

In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

Obviously, the access to our website for website visitors is free; however, we inform you that for the use of the website via mobile device the charges and the standard tariffs provided in the service contract that you have stipulated with them will still be applied by the telephone operators.

**UnitedOver as sub-processor. Obligations.**

Relative to the situations in which UnitedOver has the role of a sub-processor, we will be responsible for ensuring that, in connection with Customer Personal Data and the Services, have complied, and will continue to comply, with all applicable laws relating to privacy and data protection, including EU Data Protection Legislation and any other relevant international regulation and we have, and will continue to have, the right to transfer, or provide access to, the Personal Data for processing in accordance with the present Terms and Conditions.

In order to provide our services UnitedOver's plugin use third-party services such as SMS Gateways, Geo Location Providers, etc. for providing functionality and also uses third party tools to provide customer service and experience. In such cases, UnitedOver is not responsible for any breach of privacy regulations caused by any of these services.

**Instructions.**

UnitedOver, as Sub-processor for certain types of personal data, has the obligation

* to process Personal Data in accordance with the Law
* to provide the Services and any related technical support;
* to comply with other reasonable instructions provided by customers that are also data controllers, where such compliance is consistent with the present Terms & Conditions. Customers will ensure that, in relationship with their data subjects, their procedures for the controlling and processing of Personal Data is compliant with the Data Protection Legislation.

UnitedOver shall, in relation to any Personal Data processing:

1. implement appropriate technical and organizational measures to safeguard Personal Data, taking into account the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons;

2. ensure that any personnel whom Processor authorizes to process Personal Data on its behalf is subject to confidentiality obligations with respect to that Personal Data. The undertaking to confidentiality shall continue after the termination of the above-entitled activities;

3. comply with its obligations under the Data Protection Legislation by providing an adequate level of protection to any Personal Data that is transferred;

4. notify the Authorities without undue delay on becoming aware of a Personal Data breach, provided that such breach is not caused by Sub-processor or Sub-processor’s personnel or end users;

5. make available all information reasonably necessary to demonstrate UnitedOver’s compliance with data protection legislations.

**Confidentiality**

Sub-processor shall ensure that any personnel whom Sub-processor authorizes to process Personal Data on its behalf is subject to confidentiality obligations with respect to that Personal Data. The undertaking of confidentiality shall continue after the termination of the above-entitled activities.

**Personal Data Breaches**

Sub-processor will notify the Controller as soon as possible after it becomes aware of any Personal Data Breach affecting any Personal Data. At the Controller’s request, Sub-processor will promptly provide the Controller with all reasonable assistance necessary to enable the Controller to notify relevant Personal Data Breaches to competent authorities and/or affected Data Subjects, if Controller is required to do so under the Data Protection Law.

**Data Subject Requests**

If it is the case, sub-processor will provide reasonable assistance, including by appropriate technical and organizational measures and taking into account the nature of the Processing, to enable Controller to respond to any request from Data Subjects seeking to exercise their rights under the Data Protection Law with respect to Personal Data (including access, rectification, restriction, deletion or portability of Personal Data, as applicable), to the extent permitted by the law. If such request is made directly to sub-processor, it will promptly inform Controller and will advise Data Subjects to submit their request to the Controller. The controller shall be solely responsible for responding to any Data Subjects’ requests. The controller shall reimburse sub-processor for any potential costs arising from this assistance.

**Privacy of minors**

We do not collect or consciously request information from customers under the age of 18, nor do we consciously allow such customers to register with our services, except with parental consent. Our services and their contents are not intended for children under the age of 18.

If we learn that we have collected personal information from a child under the age of 18 without parental consent, we will delete this information as soon as possible.

If you believe we have any information about a child under the age of 18, please contact us.

**Use and Disclosure of personal data to others**

We do not rent or sell your information to third parties outside of UnitedOver without your consent. We may share your information, as well as information from tools such as cookies or similar, with third-party organizations that help us provide you with the services, but only as far as is reasonably necessary.

Compliance with Laws and Law Enforcement Requests: We may disclose to parties outside UnitedOver, files stored in our database and personal data about you that we collect when we have a good faith belief that disclosure is reasonably necessary to (a) comply with a law, regulation or compulsory legal request; or (b) to protect UnitedOver’s intellectual property rights. If we provide your Files to a law enforcement agency as set forth above, we will remove UnitedOver’s encryption from the files before providing them to law enforcement.

Business Transfers: In case we are involved in a merger, acquisition, or sale of all or a portion of our assets, your personal data may be transferred as part of that transaction, but we will notify you and/or your organization (for example, via email and/or a prominent notice on our website) of any change in control or use of your personal data or Files, or if either become subject to a different Privacy Policy.

In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We can access your information as well as store and share it in response to a request when the law requires us to do so. In addition, we may access your information, as well as store and share it, if we believe in good faith that this is necessary to: detect, prevent and manage fraud and other illegal activities; protect ourselves, you and other people, even in the context of any investigations; prevent events that could cause imminent physical damage or death

**Cookies and Tracking Technologies**

Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which internet pages, servers or apps can be assigned to the specific app or server in which the cookie was stored.

Through the use of cookies, UnitedOver can provide the customers of this website with more customer-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our websites can be optimized with the customer in mind. Cookies allow us, as previously mentioned, to recognize our websites customers. The purpose of this recognition is to make it easier for customers to utilize our websites. The website's customer that uses cookies e.g. does not have to enter access data each time the website is accessed, because this is taken over by the websites, and the cookie is thus stored on the customer's computer system.

We may use “session ID cookies” to enable certain features of the Service, to better understand how you interact with the Service and to monitor aggregate usage and web traffic routing on the Service. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of the Application.

Some web browsers may transmit “do-no-track” signals to websites with which the browser communicates.

Our website does not currently respond to these “do-not-track” signals.

**Strictly necessary cookies**

These cookies are essential, as they enable you to move around the Site and use its features, such as accessing secure areas. Without these cookies, some services you have asked for, such as payment submission, can’t be provided.

**Performance cookies**

These cookies collect information about how you use the website, for example, which pages you go to most often and if you get error messages from certain pages. These cookies don’t gather information that identifies you. All information these cookies collect is anonymous and is only used to improve how the Site works.

**Functionality cookies**

These cookies allow the Site to remember choices you make (such as your user name, language or the region you’re in). For instance, the Site uses functionality cookies to remember your language preference. These cookies can also be used to remember changes you’ve made to text size, font and other parts of pages that you can customize, or any kind of form that you left in between or unsubmitted. They may also be used to provide services you’ve asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymous and they cannot track your browsing activity on other websites.

**Targeting cookies**

These cookies are used to deliver advertisements that are more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. They remember that you have visited a website and this information may be shared with other organizations such as advertisers. This means after you have been to the Site you may see some advertisements about our services elsewhere on the Internet.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the browser or app, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time. If the user or the visitor deactivates the setting of cookies in the browser or app, then not all functions may be entirely usable.

We use automatically collected information and other information collected during the Services through cookies and similar technologies to:

(i) personalize our Service, such as remembering a Customer’s or Visitor’s information or login details so that the Customer or Visitor will not have to re-enter it during a visit or on subsequent accessing;

(ii) provide customized content and information;

(iii) monitor and analyze the effectiveness of websites and third-party activities;

(iv) monitor site usage metrics such as the number of visitors.

**Data Quality**

We will take reasonable steps to ensure that personal information we have about you is accurate, complete and up to date when we use it. Generally, we rely on you to assist us in keeping your personal information accurate and up to date.

**Data Security**

We have taken reasonable steps to keep your personal information secure at all times and in accordance with our Information Security Policies.

We also take steps to reasonably protect your personal information from misuse and loss, unauthorized access, modification or disclosure and maintained in an accurate, complete and up-to-date manner.

**Openness**

We will be honest and open with you about the type of personal information that we collect about you and the actual use of any such information. We will let you know at the time we collect your personal information, or soon after, how we will treat it.

If you require any details of the personal information held by us about you, then please contact us by e-mail.

**Opting out from Communications**

If you receive emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to the address provided in the “Contact” section.

Please be aware that if you opt-out of receiving emails from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten (10) business days for us to process your request. Please note that you may still receive administrative messages from us regarding our Services.

**Sensitive Information**

We do not believe in intrusive collection of your personal details and will not collect information that is considered highly personal or highly sensitive about you without your prior consent.

**Data Retention and Data Deletion**

We only retain the personal information collected from a Customer for as long as the Customer’s email address is active on our mailing list, or otherwise for a limited period of time as long as we need it to fulfil the purposes for which we have initially collected it, unless otherwise required by law.

In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the 2-year criteria, after your relationship with us ends.

We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

**Your rights**

Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under data protection law are:

(a) the right to access;

(b) the right to rectification;

(c) the right to erasure;

(d) the right to restrict processing;

(e) the right to object to processing;

(f) the right to data portability;

(g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes, and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.

In some circumstances, you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation unless the processing is necessary for the performance of a task carried out for reasons of public interest.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us.

**Complaints Resolution**

We are committed to providing our customers with a fair and responsive system for handling and resolving complaints concerning the handling of their personal information. You have a right to complain and to have your complaint handled efficiently if you are concerned about our handling of your personal information.

If at any time you wish to lodge a complaint in respect of the handling, use or disclosure of your personal information by us, you may do so by contacting us directly.

We aim to investigate and advise you of the outcome of the complaint promptly.

If you are not satisfied with our handling of your complaint, you may contact the Data Protection Officer at:

Email and address

**Amendments**

We may update this policy from time to time by publishing a new version on our websites.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of significant changes to this policy by email, as a website notice or through the private messaging system within our service system.