

QUINTA ESSENTIA Privacy Notice



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Version: 1.0

1. Why Do You Need this Privacy Notice?

We encourage you to carefully read this Privacy Notice as it provides you with information about your personal data being processed in connection with your access to and use of the Website.

In this Privacy Notice, personal data and personal information are used as synonyms and mean any information that directly or indirectly identifies you as an individual. This Privacy Notice explains which types of personal data we hold on you, how we collect and process such data, how long we keep it, and so on.

2. Where Can You Find the Definitions?

Unless otherwise provided in this Privacy Notice, capitalised terms used in this Privacy Notice have the meaning determined in the <u>Legal Disclaimer</u> (the "**Legal Disclaimer**"). We encourage you to read this Legal Disclaimer carefully as they affect your legal rights.

3. Who Are We and How to Reach Us?

When we say "Quinta", "we", "us", or "our", we mean Quinta Pro LTD, a BVI business company that acts as the operator of the Website. With respect to personal data collected in connection with your access and use of the Website, we act as a data controller, meaning that we solely determine what data collected as well as the purposes and means of processing of your data.

We process your personal data in accordance with this Privacy Notice and we endeavour to comply with the applicable data protection legislation.

If you have any questions regarding this Privacy Notice or the processing of your personal data, do not hesitate to contact us at info@quinta.pro

4. What Personal Data Do We Collect?

We collect and process the following types of personal data as outlined below.

Category of Data		
Examples Description or Comments		
Contact Data		
Full name Please do not provide your name unless reasonably requested by us		
Contact details This may include your email address, social media accounts, etc.		

Any other data requested by us or Data that you choose to provide us with	Please do not provide personal data unless it is reasonably necessary or requested by us.			
	Technical Data			
Internet protocol (IP) address	This means a unique address of a device, which allows us to identify your approximate location (country, city, region, ZIP code). For better understanding, IP addresses are expressed as a set of numbers, for instance: 194.150.2.33.	The Technical Data is processed by Cloudflare Inc., headquartered at 101 Townsend Street, San Francisco, CA 94107, USA		
Browser details	This includes information about the browser type and its version.	("Cloudflare"). Cloudflare serves as a gateway for traffic between you and us through encrypted HTTPS connection.		
Device details	This includes information about the type of the device (e.g., computer, tablet, or smartphone) and its model.			
Operating system	This means the information about the type and version of the operating system on your device (e.g., Windows 10, macOS version 12.4, etc.).	More information regarding Cloudflare's data processing practices is available here.		
(6 X	Marketing Data	XUNX		
Email address	Email addresses may be considered persor	nal data.		
Name				
Cookies Data				
As outlined in "What Types of Cookies Do We Collect and Use?" Section.	When you access and use the Website, cer automatically via Google, Meta, Mixpanel at You may find a detailed description in "What Collect and Use?" Section.	nd Matomo.		

5. How Do We Use Personal Data?

Description	Lawful Basis for Processing
	Contact Data
To respond to your inquiry.	Our legitimate interest to respond to your inquiry.

Technical Data				
To ensure the operation of the Website.	Our legitimate interest to improve the Website functionality and user experience, detect fraud and			
To provide a better user experience by improving functionality, usability, user flow and interface of the Website.	respond to requests from authorities.			
	Marketing Data			
To provide you with marketing and newsletter emails concerning the Product and/or Project in general.	Our legitimate interest to provide you, as our former or current user, with information regarding the Product and/or Project in general. You may unsubscribe from receiving marketing and newsletter emails from us at any time by (i) contacting us; or (ii) clicking the unsubscribe button available at the bottom of each marketing and newsletter email. In this case, we will delete your email address from the respective marketing database. Please note that administrative or service-related communications (security alerts, email verifications, maintenance notifications, etc.) are not considered marketing and such communications may not offer an option to unsubscribe.			
	Cookies Data			
As outlined in "What Types of Cookies Do We Collect and Use?" Section below.	Your consent.			

6. How Long Do We Process Your Data?

As a general rule, we keep personal data as long as it is necessary for the purposes it was collected. We may process certain personal data longer than outlined below, if it is necessary:

- (a) to meet our legal obligations under the applicable law;
- (b) in relation to anticipated or pending legal proceedings; or
- (c) to protect our rights and legitimate interests or those of third parties.

Storage Period	Rationale
	Contact Data
For one (1) year from the last date when you contacted us regarding the same matter.	We set this retention period due to the statutes of limitations established in the Legal Disclaimer.

	Technical Data
Until the browsing session from your respective device expires.	We need such data only as long as you have an active browsing session.
	Marketing Data
As long as you remain a subscriber.	We process such data until you opt out from receiving our marketing and newsletter emails.
	Cookies Data
Up to one (1) year. You may find specific timelines in "What Types of Cookies Do We Collect and Use?" Section.	We need such data for the purposes outlined by us in "What Types of Cookies Do We Collect and Use?" Section.

7. How Do We Share Your Data?

General. We do not sell or rent out your data. However, we may share your personal data in accordance with this Privacy Notice, applicable data protection legislation, or with your consent, in each case for the purposes of and if it is reasonably necessary:

- (a) to enable you to access and use the Website; or
- (b) for compliance with the applicable laws and regulations.

Please note that if we share any portion of your personal data with third persons, we will endeavour to secure such transfer using appropriate legal, organisational, and technical measures.

Recipients. Given the purposes outlined above, your personal information may be shared with the following categories of recipients:

- (a) Affiliates;
- (a) analytical solution providers, such as Google, Meta, Mixpanel, Matomo;
- (b) support and technical teams;
- (c) marketing teams;
- (d) hosting service providers;
- (e) email delivery service providers;
- government authorities, upon their request or if necessary to comply with our legal obligations;
- (g) another entity if we sell or otherwise transfer the Website; and
- (h) other third-party solutions, which may be from time to time integrated into the Website, such as Cloudflare.

8. Are You Subject to Automated Decision-Making?

Automated decision-making is the process of making a decision by automated means without any human influence on the outcomes. We do not make any automated decisions based on your personal data. If we intend to process your personal data by any automated means, we will do our best to inform you about the same prior to such processing.

9. What About Interacting with Third-Party Links?

The Website may include links and social media plugins to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share certain data about you. We do not control these third-party websites and applications, and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy/notice/statement of every website or application you visit.

10. What Data Subject Rights Do You Have?

General. According to the applicable data protection legislation, you may have the rights outlined below. In order to exercise your rights as a data subject, we may request certain information from you to verify your identity and confirm that you have the right to exercise such rights.

Data Subject Rights. According to the applicable data protection legislation, you may have the following rights:

Rights	Description
Right to access your personal data (commonly known as a "data subject access request")	This enables you to ask us whether we process your personal data. If we process your data, you may request certain information about the processing activity and/or a copy of the personal data we hold about you, and check that we are lawfully processing it.
Right to rectification of the personal data	This enables you to have any incomplete or inaccurate data we hold about you completed or rectified, though we may need to verify the accuracy of the new data you provide to us.
Right to erasure of your personal data (commonly known as a "right to be forgotten")	This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal or technical reasons which will be notified to you, if applicable, at the time of your request.

Right to object to processing of your personal data	This enables you to object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Right to restrict the processing of your personal data	This enables you to ask us to suspend the processing of your personal data in the following scenarios: (i) if you want us to establish the data's accuracy, (ii) where our use of the data is unlawful but you do not want us to erase it, (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
Request the transfer of your personal data (commonly known as a " right to the data portability ")	We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
Right to withdraw consent	You may withdraw your consent at any time where we are relying on consent to process your personal data.
Right not to be subject to automated decision-making	You reserve the right not to be subject to a decision based solely on automated processing of data, including profiling, which produces legal effects concerning you or similarly significantly affecting you.
Right to file a complaint	You may file a complaint with a relevant supervisory authority in case we violate your rights or obligations imposed on us under the applicable data protection legislation. The relevant supervisory authority will particularly depend on where you are located.

11. Do We Process Children's Personal Data?

The Website is not intended for the use of children (under 18 years old or older, if the country of your residence determines a higher age restriction). We do not knowingly market to, solicit, process, collect, or use personal data of children.

If we become aware that a child has provided us with personal information, we will use commercially reasonable efforts to delete such information from our database. If you are the parent or legal guardian of a child and believe that we have collected personal information from your child, please contact us.

12. What Types of Cookies Do We Collect and Use?

General. Cookies are, in effect, small data files that are placed on the browser of a visitor's device (such as computer, smartphone, tablet, etc.) when accessing online content and by which it is possible to recognise that device when it interacts with or returns to the Website (the "**Cookies**"). Cookies and similar technologies use unique codes that act as an identifier and, in certain circumstances, may be treated as personal data under the applicable data protection legislation. This is because they can enable the user of a device to be uniquely recognised as the same user, even if their "real world" identity is unknown. Please note that we may involve third-party service providers to collect and process certain Cookies.

Cookies Types. We collect essential and non-essential Cookies. Essential Cookies are required for the Website to operate properly. We do not need your consent to operate essential Cookies since these Cookies ensure basic functionalities and security features of the Website, anonymously. We are required to get your consent to operate the non-essential Cookies, used to analyse your behaviour on the Website (e.g., analytical cookies), or to build your advertising profile and identify you for advertisement targeting (e.g., targeting cookies). In particular, we collect and use the following types of Cookies:

Category			
Cookie name	Operator	Purpose/Description	Storage period
	V 1	Essential	
g_pref_lang	Google	To store the visitor's preferred language.	30 days
g_authuser_h		To authenticate the visitor and identify the currently active account.	session
g_secure_session	1	To provide a secure session.	\forall
g_session_id		To identify a visitor's unique session.	
fb_auth_token	Meta	To authenticate the visitor and secure the account.	
fb_session_secure		To provide a secure session.	
fb_lang_preference		To store the visitor's preferred language.	30 days
fb_notification_setti ngs		To save the visitor's notification settings.	14 days
Analytical			
g_analytics_visit	Google	To collect visitor's visit data such as number of visits, length of stay on the Website, and pages viewed.	30 days

g_user_behavior_a nalytics		To track visitor's actions on the Website, such as clicks, navigation, and interaction with elements.	
g_traffic_source		To record information about where the visitor came from (e.g., search engine, referral source, or direct click-through).	14 days
g_ab_testing		To determine which A/B testing group a visitor belongs to and tracks their interaction with different versions of web pages.	1 day
ga_analytics_tracki ng		To collect anonymous data about a visitor's traffic and interaction with a Website using Google Analytics.	90 days
fb_analytics_visit	Meta	To collect visitor's visit data such as number of visits, length of stay on the Website, and pages viewed.	30 days
fb_user_behavior_ analytics	-	To track visitor's actions on the Website, such as clicks, navigation, and interaction with elements.	1
fb_traffic_source	V 1	To record information about where the visitor came from (e.g., search engine, referral source, or direct click-through).	14 days
fb_ab_testing	\wedge	To determine which A/B testing group a visitor belongs to and tracks their interaction with different versions of web pages.	1 day
mixpanel_event_tra cking	Mixpanel	To track visitor's events and actions on the Website to analyse interactions with its functionality.	30 days
mixpanel_user_seg ment		To save visitor's data for further audience segmentation and visitor group analysis.	60 days
mixpanel_conversi on_funnel	7	To track the steps a visitor takes in the conversion process to analyse the effectiveness of the funnel.	90 days
mixpanel_user_id		To identify unique visitors and track their behaviour and interaction with the Website to	365 days
_pk_id	Matomo	analyse traffic.	
_pk_conversions		To track conversions and actions taken by visitors after interacting with the advertisement.	
_pk_ref		To record traffic sources where visitors came from (e.g. search engines, links).	182 days

_pk_cvar		To store custom variables related to visitor interaction with various page elements.	30 days		
	Targeting				
google_ads_perso nalization	Google	To save visitor's preference information to better customise the ads displayed.	30 days		
google_ad_interacti on		To track visitor's interaction with ads to analyse campaign effectiveness.	90 days		
google_audience_s egmentation		To save collected data to form audience segments for more accurate ad targeting.	60 days		
google_conversion _tracking		To track visitor's actions after clicking on ads to measure the effectiveness of marketing campaigns.	7 days		
fb_conversion_trac king	Meta	To track visitor's actions after clicking on an advertisement to measure the effectiveness of the advertising campaign.			
fb_user_tracking	1	To track visitor's interactions with various ads and content on the Website and in Facebook to more accurately identify interests and preferences.	90 days		
fb_audience_segm entation	V (To save collected data to form audience segments for more accurate ad targeting.			
fb_personalized_ad s	Λ^{-1}	To save information about visitor's preferences to provide personalised promotional offers.	60 days		
matomo_user_seg ment	Matomo	To store information about which audience segment a visitor belongs to based on their behaviour, which can be used to target specific groups.	4		
		Functional			
g_ui_settings	Google	To store preferred visitor interface settings such as theme or panel layout.	30 days		
g_personalized_rec s		To store visitor preference data to provide personalised content recommendations.			
g_last_search		To save a visitor's last search query for convenience on future visits.	14 days		
g_video_state		To save the current status of the video player, such as playback position and audio settings.	1 day		
fb_ui_settings	Meta	To store visitor's preferences for the appearance and layout of Website interface elements.	30 days		

fb_social_widgets		To save the settings of widgets and social media widgets on the visitor's page.	
fb_personalized_re cs		To save visitor preference data to provide personalised content recommendations.	
fb_last_search		To save a visitor's last search query for convenience on future visits.	14 days
matomo_lang_pref	Matomo	To store a visitor's preferred language for personalised display of content on the Website.	30 days
matomo_display_pr ef		To store visitor's preferences for displaying certain elements or categories of content.	
matomo_widgets_p ref		To save the configuration of widgets and toolbars on the visitor's web page.	
matomo_notificatio ns_pref		To save notification settings for visitors, allowing them to manage their preferences.	14 days
Other			
youtube_personaliz ation	Google	To save visitor's preferences to provide personalised video recommendations on the YouTube platform.	60 days

Cookies Data. The Cookies collect the following data which may be considered personal: anonymised ID, internet protocol (IP) address, device details, operating system, browser details, information regarding your current location, information regarding your visit source (e.g. direct entry, social media, websites), information regarding duration of your visit of the Website, information regarding your use of the Website, for instance, when you clicked a certain button or made some input.

Third-Party Service Providers. More information regarding cookies placed by Google, Meta, Mixpanel and Matomo is provided below.

A. Google Data

When you access and use the Website, certain data may be collected automatically via Google Analytics. More information regarding Google Analytics is available here.

After collecting the personal data, Google creates reports about the use of the Website, which contain the aggregated information where we do not see any data pertaining to a particular person. In other words, we cannot identify you from other Website visitors. For better understanding, IP address means an "online address" of a device, which may help to identify your approximate location (e.g, country, city or region, ZIP code). The IP addresses are expressed as a set of numbers, for example: 194.150.2.33. Please note that according to <u>Google's documentation</u>, the IP address is anonymised (masked), so neither we nor Google can identify the IP address and precise location of a particular visitor.

Google Analytics is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, and its affiliates including Google LLC, 1600, Amphitheatre Parkway, Mountain View, CA, 94043, USA ("Google").

To our knowledge, the data collected via Google Analytics is not anonymised (with the exception of the IP address) and will be transmitted to, processed and stored by Google in the United States. You can learn more about how Google processes personal data in <u>Google's privacy policy</u>. Note that competent US state authorities may have access to personal data collected by Google.

With respect to personal data collected via Google Analytics, Google acts as our data processor. However, Google may use this personal data for any of its own purposes, such as profiling and cross-platform tracking. In this case, Google acts as an independent data controller. You can learn more about Google tools here.

B. Meta Data

We use the so-called Meta Pixel provided by Meta for the following purposes:

- (a) Meta Custom Audiences. We use the Meta Pixel for the remarketing purposes to be able to contact you again within 180 days. This allows us to display interest-based advertisements (Meta Ads) to the Website visitors when they visit Meta products or other third-party websites also using the Meta Pixel tool. In this way, we pursue the interest in displaying advertisements that are of your interest in order to promote us and make the Website or its content more interesting for you.
- (b) Meta conversion. We also use the Meta Pixel to ensure that our Meta Ads match the potential interest of users and are not irritating. With the Meta Pixel, we can track the effectiveness of the Meta Ads. This is necessary for statistical and market research purposes by seeing whether users were redirected to the Website after clicking on the Meta Ads.

Your browser automatically establishes a direct connection with the Meta server as soon as you have agreed to the use of the Meta Pixel cookies. Through the integration of the Meta Pixel, Meta receives the information that you used our Website or clicked on an advertisement from us. If you are registered with any of Meta products, Meta can assign the visit to your respective account.

The Meta Pixel tool is operated by Meta Platforms, Inc., 1 Hacker Way, Menlo Park, CA, USA, and its affiliates, including Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("**Meta**").

The terms of the Meta Pixel data processing by Meta and us are established in the <u>Data Processing Terms</u>. Meta processes the data received from the Meta Pixel tool in accordance with their <u>Meta Privacy Policy</u>. Additional information regarding the Meta Pixel may be found in the <u>Meta Pixel Help Center</u>.

We and Meta are data controllers, meaning that we jointly determine the purposes and scope of processing your personal data, for the following data processing activities in connection with the Meta Pixel:

- (a) creation of individualised or suitable ads, as well as for their optimization;
- (b) delivery of commercial and transaction-related messages.

The following data processing activities are not covered by the joint controllership:

- (a) the process that takes place after the collection and transmission is within the sole responsibility of Meta;
- (b) the preparation of reports and analyses in aggregated and anonymised form is carried out by Meta as a processor and we act as a controller.

We have concluded a corresponding <u>agreement with Meta for joint controllership</u>. This agreement defines the respective responsibilities for fulfilling the obligation under the data protection legislation with regard to joint controllership. In particular, we have agreed with Meta that Meta can be used as a contact point for the exercise of your data protection rights regarding the data collected by the Meta Pixel tool.

C. Mixpanel and Matomo Data

When you access and use the Website, certain data may be collected automatically via the Mixpanel solution and Matomo service.

More information regarding Mixpanel is available <u>here</u>. The Mixpanel solution is operated by Mixpanel, Inc., One Front Street, 28th Floor, San Francisco, CA 94111 ("**Mixpanel**").

You may find more information about Matomo and how it handles data <u>here</u>. The Matomo service is operated by InnoCraft Ltd., 7 Waterloo Quay PO625, 6140 Wellington, New Zealand ("**Matomo**").

Mixpanel and Matomo provide us with the analytics regarding how users visited the Website, how long they stayed on the Website, etc. This helps us to provide a better experience and to understand the content you find useful.

14. How Can You Control Cookies?

When you first access the Website, you have the right to decide whether to accept or reject nonessential Cookies. You do not need to allow non-essential Cookies to access and use the Website. However, enabling non-essential Cookies may allow for a more tailored browsing experience.

You can also disable non-essential Cookies within the Cookies preference centre available within the Website or by changing your browser settings at any time. How you can do this will depend on the browser you use. Most browsers (for example, Microsoft and Google) have dedicated privacy pages that explain how websites collect, handle, and pass on information to third parties.

15. Can We Modify and Update this Privacy Notice?

We keep our Privacy Notice under regular review and we may update it at any time. If we make any changes to this document, we will change the "Last Updated" date above. Please review this Privacy Notice to check for the updates. If we make substantial changes to the way we treat your personal information, we will display a notice on the Website.

