Privacy Policy of healyeatsreal.com

This Website collects some Personal Data from its Users.

Owner and Data Controller

Healy Eats Real LLC 18 Bartol Street, Unit #1080 San Francisco, CA 94133

Owner contact email: hannah@healyeatsreal.com

Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Cookies, Usage Data, email address and first name.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

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

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party services used by this Website 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 this Website and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this

Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some
 legislations the Owner may be allowed to process Personal Data until the User objects to
 such processing ("opt-out"), without having to rely on consent or any other of the following
 legal bases. This, however, does not apply, whenever the processing of Personal Data is
 subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of
 official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the
 Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be
 retained as long as needed to fulfill such purposes. Users may find specific information
 regarding the legitimate interests pursued by the Owner within the relevant sections of this
 document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: SPAM protection, Interaction with external social networks and platforms, Analytics, Commercial affiliation, Hosting and backend infrastructure, Traffic optimization and distribution, Managing contacts and sending messages, Interaction with data collection platforms and other third parties, Advertising, Displaying content from external platforms, Handling payments and Platform services and hosting.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

Detailed information on the processing of Personal Data

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

Advertising

This type of service allows User Data to be utilized for advertising communication purposes displayed in the form of banners and other advertisements on this Website, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Website. For more information, please check the privacy policies of the relevant services.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the <u>Network Advertising Initiative opt-out page</u>.

Direct Email Marketing (DEM) (this Website)

This Website uses the User Data to propose services and products provided by third parties or unrelated to the product or service provided by this Website.

Personal Data collected: email address.

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Wordpress Stats (Automattic Inc.)

Wordpress Stats is an analytics service provided by Automattic Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

Commercial affiliation

This type of service allows this Website to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with this Website.

For details of which data are collected, please refer to the privacy policy of each service.

Amazon Affiliation (Amazon)

Amazon Affiliation is a commercial affiliation service provided by Amazon.com Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

CJ Affiliate by Conversant (Conversant, Inc.)

CJ Affiliate by Conversant is a commercial affiliation service provided by Conversant, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

ClickBank (Click Sales Inc.)

ClickBank is a banner commercial affiliation service provided by Click Sales Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

iDevAffiliate (iDevDirect LLC)

iDevAffiliate is a commercial affiliation service provided by iDevDirect LLC.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

JVZoo (BBC Systems Inc.)

JVZoo is a banner commercial affiliation service provided by BBC Systems Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

ShareAsale (ShareAsale.com Inc.)

ShareAsale is a banner commercial affiliation service provided by ShareAsale.com Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Gravatar (Automattic Inc.)

Gravatar is an image visualization service provided by Automattic Inc. that allows this Website to incorporate content of this kind on its pages.

Please note that if Gravatar images are used for comment forms, the commenter's email address or parts of it may be sent to Gravatar - even if the commenter has not signed up for that service.

Personal Data collected: email address and Usage Data.

Place of processing: United States – Privacy Policy.

Instagram widget (Instagram, Inc.)

Instagram is an image visualization service provided by Instagram, Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

YouTube video widget (Google Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

Handling payments

Payment processing services enable this Website to process payments by credit card, bank transfer or other means. To ensure greater security, this Website shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction.

Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

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

Place of processing: United States – Privacy Policy.

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable this Website to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Website. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Amazon Web Services (AWS) (Amazon)

Amazon Web Services is a hosting and backend service provided by Amazon.com Inc.

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

Place of processing: See the Amazon privacy policy – Privacy Policy.

Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Website for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

ConvertKit widget (ConvertKit LLC)

The ConvertKit widget is a service for interacting with the ConvertKit email address management and message sending service provided by ConvertKit LLC.

Personal Data collected: Cookies, email address, first name and Usage Data.

Place of processing: United States – Privacy Policy.

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website.

The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

Google+ +1 button and social widgets (Google Inc.)

The Google+ +1 button and social widgets are services allowing interaction with the Google+ social network provided by Google Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

Pinterest "Pin it" button and social widgets (Pinterest)

The Pinterest "Pin it" button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

Twitter Tweet button and social widgets (Twitter, Inc.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

StumbleUpon button and social widgets (StumbleUpon, Inc.)

The StumbleUpon button and social widgets are services allowing interaction with the

StumbleUpon social network provided by StumbleUpon, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

YouTube button and social widgets (Google Inc.)

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google Inc.

Personal Data collected: Usage Data.

Place of processing: United States – Privacy Policy.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

ConvertKit (ConvertKit LLC)

ConvertKit is an email address management and message sending service provided by ConvertKit LLC.

Personal Data collected: Cookies, email address, first name and Usage Data.

Place of processing: United States – Privacy Policy.

Platform services and hosting

These services have the purpose of hosting and running key components of this Website, therefore allowing the provision of this Website from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to build, run and host this Website.

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

Place of processing: United States – Privacy Policy.

SPAM protection

This type of service analyzes the traffic of this Website, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Akismet (Automattic Inc.)

Akismet is a SPAM protection service provided by Automattic Inc.

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

Place of processing: United States - Privacy Policy.

• Traffic optimization and distribution

This type of service allows this Website to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information User are transferred.

CloudFlare (Cloudflare)

CloudFlare is a traffic optimization and distribution service provided by CloudFlare Inc.

The way CloudFlare is integrated means that it filters all the traffic through this Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

Personal Data collected: Cookies and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Further information about Personal Data

AdThrive: AdThrive is an advertising service provided by AdThrive, LLC – Privacy Policy.

- Optimize Press: Optimize Press is a landing page management service that allows this
 Application to collect the email addresses of Users interested in its service. Optimize Press
 allows the Owner to track and analyze the User response concerning web traffic or behavior
 regarding changes to the structure, text or any other component of the created landing
 pages.
- Icegram: Icegram is an email collection management plugin that allows this Application to collect the email addresses of Users interested in its service.

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their
 Data if the processing is carried out on a legal basis other than consent. Further details are
 provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to
 receive their Data in a structured, commonly used and machine readable format and, if
 technically feasible, to have it transmitted to another controller without any hindrance. This
 provision is applicable provided that the Data is processed by automated means and that
 the processing is based on the User's consent, on a contract which the User is part of or on
 pre-contractual obligations thereof.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Applicability of broader protection standards

While most provisions of this document concern all Users, some provisions expressly only apply if the processing of Personal Data is subject to broader protection standards.

Such broader protection standards apply when the processing:

- is performed by an Owner based within the EU;
- concerns the Personal Data of Users who are in the EU and is related to the offering of paid or unpaid goods or services, to such Users;
- concerns the Personal Data of Users who are in the EU and allows the Owner to monitor such Users' behavior taking place in the EU.

Cookie Policy

This Website uses Cookies. To learn more and for a detailed cookie notice, the User may consult the Cookie Policy.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website 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, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

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

How "Do Not Track" requests are handled

This Website does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Owner remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Owner has about Users.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, 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 this Website who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

This Website (or this Application)

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

Service

The service provided by this Website as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookies

Small sets of data stored in the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Website, if not stated otherwise within this document.