

Privacy Policy of www.blueupbeacons.com

Welcome to the privacy policy of www.blueupbeacons.com.

This policy will help you understand what data we collect, why we collect it, and what your rights are.

Last updated: December 11, 2025

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Data Controller

BlueUp Srl

Loc. Belvedere, ingresso 2, 53034 Colle Val d'Elsa (SI), ITALY

Data Controller email address: info@blueupbeacons.com

Type of Data We Collect

Among the Personal Data collected by this Website, either independently or through third parties, are:

- Tracking Tools
- Usage Data
- First Name
- Last Name
- Email
- Phone Number
- Company Name
- Website
- Number of Users
- Device Information
- Session Statistics

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the Data is collected.

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

Unless otherwise specified, all Data requested by this Website is mandatory. 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 optional, Users are free not to provide such Data, without any consequences on the availability or operation of the Service.

Users who are uncertain about which Data is mandatory are encouraged to contact the Owner.

Any use of Cookies - or other tracking tools - by this Website or by the owners of third-party services used by this Website is intended to provide the Service requested by the User, in addition to any other purposes described in this document and in the Cookie Policy.

The User assumes responsibility for the Personal Data of third parties obtained, published, or shared through this Website.

Method and place of processing of collected data

Methods of processing

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

The processing is carried out using computer and/or IT tools, following organizational methods and logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other parties involved in the operation of this website (administrative, sales, marketing, legal, system administration personnel) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) may have access to the Data, also appointed, if necessary, as Data Processors by the Data Controller. The updated list of Data Processors 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 in the processing are located. For further information, please contact the Data Controller.

The User's Personal Data may be transferred to a country other than their own. For further information on the place of processing, the User can refer to the section containing details on the processing of Personal Data.

Retention Period

Unless otherwise stated in this document, Personal Data is processed and stored for the time required by the purpose for which it was collected and may be retained for a longer period due to any legal obligations or based on the User's consent.

Purpose of Processing of Collected Data

The User's Data is collected to allow the Owner to provide its Service, comply with legal obligations, respond to requests or enforcement actions, protect its rights and interests (or those of its Users or third parties), identify any malicious or fraudulent activity, as well as for the following purposes:

- Interaction with external social networks and platforms
- Contacting the User
- Statistics
- Platform and hosting services
- Displaying content from external platforms

- Tag Management
- Advertising
- Managing contacts and sending messages

Details on the Processing of Personal Data



Contacting the User

Contact form

Personal Data processed: Last name +5



Mailing list or newsletter

Personal Data processed: Usage data +2

Contact management and sending messages

This type of service allows you to manage a database of email contacts, phone numbers, or any other contact information used to communicate with the User.

These services may also collect data relating to the date and time the messages are viewed by the User, as well as the User's interaction with them, such as information on clicks on links included in messages.



Brevo

Company: SendinBlue SAS

Place of processing: France

Personal data processed: Usage data +2Tag management

This type of service allows the Owner to centrally manage the tags or scripts required on this Website. Consequently, User Data may be processed by these services, with the possibility of storing them.



Google Tag Manager

Company: Google LLC +1

Place of processing: United States +1

Personal Data processed: Tracking Tools

Interaction with social networks and external platforms

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

The interactions and information acquired by this Website are in any case subject to the User's privacy settings for each social network.

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

It is recommended to log out of the respective services to ensure that the data processed on this Website is not linked to the User's profile.



Tweet button and Twitter social widgets

Company: X Corp.

Place of processing: United States

Personal Data processed: Usage data +1



LinkedIn button and social widgets

Company: LinkedIn Corporation

Place of processing: United States

Personal data processed: Usage data +1

Advertising

This type of service allows User Data to be used for commercial communication purposes. These communications are displayed on this Website in the form of banners and other forms of advertising, including in relation to the User's interests.

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

Some of the services listed below may use Tracking Tools to identify the User, or use behavioral retargeting techniques, i.e., displaying personalized ads based on the User's interests and behavior, or measure ad performance.

For more information, we recommend checking the privacy policies of the respective services.

These services typically allow Users to opt out of this tracking. Users can learn how to opt out of interest-based advertising by visiting the opt-out section in this document.



Microsoft Advertising

Company: Microsoft Corporation

Place of processing: United States

Personal Data processed: Usage Data +1



Google Conversion Linker

Company:

Google LLC

Place of processing:

United States

Personal Data processed:

Usage Data +1

Platform and hosting services

These services are intended to host and operate key components of this Website, allowing this Website to be provided from a single platform. These platforms provide the Owner with a wide range of tools, such as analytics tools, user registration management, comment and database management, e-commerce, payment processing, etc. The use of these tools involves the collection and processing of Personal Data.

Some of these services operate through geographically distributed servers in different locations, making it difficult to determine the exact location where the Personal Data is stored.



Shopify

Company: Shopify Inc.

Place of processing: Canada

Personal Data processed: various types of Data as specified in the service's privacy policy

Statistics

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



Google Analytics (Universal Analytics) with anonymized IP

Company: Google LLC

Place of processing: United States

Personal Data processed: Usage data +1



Google Analytics (Universal Analytics)

Company: Google LLC

Place of processing: United States

Personal Data processed: Usage data +1



Google Analytics 4

Company: Google Ireland Limited

Place of processing: Ireland

Personal Data processed: Usage data +4

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. These services are often called widgets, which are small elements inserted into a website or application. They provide specific information or perform a specific function and often allow interaction with the user.

This type of service may still collect web traffic data relating to the pages where the service is installed, even when users do not use it.



Google Maps Widget

Company: Google LLC

Place of processing: United States

Personal data processed: Usage data +1



Google Fonts

Company: Google LLC +1

Place of processing: United States +1

Personal data processed: Usage data +1

Information on how to opt out of interest-based ads

In addition to any opt-out function provided by any of the services listed in this document, Users can learn more about how to opt out of interest-based ads in the relevant section of the Cookie Policy.

Cookie Policy

This Website uses Trackers. To learn more, Users can consult the Cookie Policy.

Further information for Users in the European Union

Legal basis for processing

The Data Controller processes Personal Data relating to the User if one of the following applies:

- The User has given consent for one or more specific purposes.
- Processing is necessary for the performance of a contract with the User and/or for any pre-contractual obligations thereof;
- Processing is necessary for compliance with a legal obligation to which the Data Controller is subject;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by third parties.

In any case, the Data Controller may always be asked to clarify the specific legal basis for each processing operation, and in particular whether the processing is required by law, provided for by a contract, or necessary to enter into a contract.

Further information on retention periods

Unless otherwise stated in this document, Personal Data is processed and retained for the time required by the purpose for which it was collected and may be retained for a longer period due to any legal obligations or based on the User's consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User will be retained until such contract has been fully performed.
- Personal Data collected for purposes related to the Owner's legitimate interests will be retained until such interests are fulfilled. Users may obtain further information regarding the legitimate interests pursued by the Owner in the relevant sections of this document or by contacting the Owner.

When processing is based on the User's consent, the Owner may retain Personal Data for a longer period until such consent is withdrawn. Furthermore, the Data Controller may be required to retain Personal

Data for a longer period to comply with a legal obligation or an order of an authority.

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

User Rights under the General Data Protection Regulation (GDPR)

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

Specifically, within the limits established by law, the User has the right to:

- withdraw consent at any time.
- The User may withdraw previously expressed consent to the processing of their Personal Data.
- object to the processing of their Data.
- The User may object to the processing of their Data when it occurs pursuant to a legal basis other than consent.
- access their Data.
- The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing, and to receive a copy of the Data processed.
- verify and request rectification.
- The User can verify the accuracy of their Data and request its updating or correction.
- obtain restriction of processing.
- The User may request restriction of processing of their Data. In this case, the Data Controller will not process the Data for any purpose other than its storage.
- obtain the deletion or removal of their Personal Data.
- The User may request the deletion of their Data from the Data Controller.
- receive their Data or have it transferred to another controller.
- The User has the right to receive their Data in a structured, commonly used, and machine-readable format and, where technically feasible, to have it transferred to another controller without hindrance.
- Filing a complaint.
- The User may file a complaint with the competent data protection supervisory authority or take

legal action.

Users have the right to obtain information regarding the legal basis for the transfer of Data abroad, including to any international organization by governed international law or consisting of two or more countries, such as the UN, as well as regarding the security measures adopted by the Owner to protect their Data.

Details on the right to object

When Personal Data is processed in the public interest, in the exercise of official authority vested in the Data Controller, or to pursue a legitimate interest of the Data Controller, Users have the right to object to such processing for reasons relating to their particular situation.

Users are informed that, if their Data is processed for direct marketing purposes, they can object to the processing at any time, free of charge and without providing any justification. If Users object to the processing for direct marketing purposes, their Personal Data will no longer be processed for such purposes. To learn whether the Data Controller processes Data for direct marketing purposes, Users can refer to the relevant sections of this document.

How to exercise your rights

Any requests to exercise your rights can be addressed to the Data Controller using the contact details provided in this document. The request is free of charge and the Data Controller will respond as soon as possible, in any case within one month, providing the User with all the information required by law. Any rectification, erasure, or restriction of processing will be communicated by the Data Controller to each recipient, if any, to whom the Personal Data has been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller will inform the User of these recipients upon request.

Additional information for Users in Switzerland

This section applies to Users in Switzerland and, for such Users, replaces any other information that may be divergent or conflicting in this privacy policy.

Further details regarding the categories of Data processed, the purposes of the processing, the categories of recipients of the Personal Data, if any, the retention period, and other information about the Personal Data can be found in the section entitled "Detailed Information on the Processing of Personal Data" within this document.

User rights under the Federal Act on the Protection of Personal Data

Users may exercise certain rights regarding their data within the limits of the law, including the following:

- Right to access Personal Data;
- The right to object to the processing of your Personal Data (which also allows Users to request the restriction of processing, the erasure or destruction of Personal Data, and the prohibition of disclosure of Personal Data to third parties);
- The right to receive your Personal Data and to transfer it to another data controller (data portability);
- The right to request the rectification of inaccurate Personal Data.

How to exercise these rights

Any requests to exercise your rights may be addressed to the Data Controller using the contact details provided in this document. These requests are free of charge, and the Data Controller will respond as quickly as possible, providing Users with the information required by law.

Additional Information for Users in Brazil

This section of the document supplements and complements the information contained in the rest of the privacy policy and is provided by the entity that operates this Website and, if applicable, its parent company, subsidiaries, and affiliates (for the purposes of this section, collectively referred to as "we," "us," or "our").

This section applies to all Users in Brazil (such Users are referred to below simply as "you," "your," or "yours"), pursuant to the "Lei Geral de Proteção de Dados" (General Data Protection Act) and, for such Users, prevails over any other information contained in this privacy policy that may be divergent or conflicting.

This section uses the term "personal information" as defined by the LGPD.

Legal bases by which we process your personal information

We process your personal information exclusively if one of the legal bases for such processing exists. The legal bases are as follows:

- your consent to the processing activities in question;
- compliance with legal obligations to which we are subject;
- enforcement of provisions dictated by laws or regulations or by contracts, agreements, or other similar legal instruments;

- studies conducted by research institutions, preferably conducted on anonymized personal information;
- performance of a contract; and of the relevant pre-contractual obligations, if you are a party to such a contract;
- the exercise of our rights in court, in administrative proceedings, or in arbitration;
- the defense or physical safety of you or a third party;
- the protection of health - in the context of procedures carried out by entities or healthcare professionals;
- our legitimate interest, provided that your fundamental rights and freedoms do not prevail over such interests; and
- the protection of credit.

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

Categories of Personal Information Processed

To find out what categories of personal information we process, please refer to the "Details on the Processing of Personal Data" section of this document.

Why we process your personal information

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

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

Your privacy rights in Brazil

You have the right to:

- obtain confirmation of the existence of processing activities concerning your personal information;
- access your personal information;
- obtain the rectification of incomplete, inaccurate, or outdated personal information;
- obtain the anonymization, blocking, or erasure of unnecessary or excessive personal information, or information processed in violation of the provisions of the GDPR;

- obtain information regarding the possibility of granting or refusing your consent and the related consequences;
- obtain information regarding the third parties with whom we share your personal information;
- obtain, upon your explicit request, the portability of your personal information (except for anonymized information) to other providers of products or services, provided that our trade and business secrets are safeguarded;
- obtain the erasure of personal information processed where the processing was based on your consent, unless one or more of the exceptions provided for in Article 16 of the GDPR applies;
- withdraw your consent at any time;
- File a complaint regarding your personal information with the ANPD (National Data Protection Authority) or a consumer protection body;
- Object to processing activities where such processing is not carried out in accordance with the law;
- Request clear and adequate information regarding the criteria and procedures used in automated decision-making processes; and
- Request review of decisions that harm your interests, made solely on the basis of automated decision-making processes involving your personal information. These include decisions to profile you personally, professionally, as a consumer or creditor, or other aspects of your personality.

You will never be discriminated against, nor will you suffer any unfavorable treatment in any way, as a result of exercising your rights.

How to submit a request

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

How and when we will handle your request

We will do our best to respond to your request as quickly as possible.

However, if this is impossible for us, we will ensure that we communicate the factual or legal reasons that prevent us from immediately responding to or following up on your request. If we are not processing your personal information, if we are able to do so, we will indicate the natural or legal person to whom you should address your requests.

If you decide to submit a request for access or a request for confirmation of the processing of your personal information, please be sure to specify whether you prefer to receive your personal information in electronic or paper format.

You should also let us know whether you require an immediate response, in which case you will receive a simplified response, or whether you require a complete disclosure.

In the latter case, we will respond within 15 days of your request, providing you with all the information regarding the source of your personal information, confirmation of whether or not personal information concerning you exists, all the criteria used for processing and the purposes of such processing, while safeguarding our commercial and industrial secrets.

If you decide to submit a request for rectification, erasure, anonymization, or blocking of personal information, we will ensure that we immediately inform the other parties with whom we have shared your personal information so that they can also comply with your request—except in cases where such communication is impossible or excessively burdensome for us.

Transfer of personal information outside of Brazil where permitted by law

We may transfer your personal information outside of Brazil in the following cases:

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

Further information for Users in the United States

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

The information contained in this section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are residents in the following states:

California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information.

Notice at collection

The following Notice at collection provides you with timely notice about the categories of Personal Information collected or disclosed in the past 12 months so that you can exercise meaningful control over our use of that Information.

While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.

Internet or other electronic network activity information

Sold or Shared

Targeted Advertising

Personal Data processed: Tracking Tools; Usage Data; First Name; Last Name + 7

Personal Information collected or disclosed:

- Tracking Tools
- Usage Data
- First Name
- Last Name
- Email
- Phone Number
- Company Name

- Website
- Number of Users
- Device Information
- Session Statistics
- **Purposes:**
 - Interaction with Social Networks and External Platforms
- Contacting the User
- Statistics
- Viewing Content from External Platforms
- Tag Management
- Advertising
- Contact Management and Sending Messages

Retention Period: For the time necessary to fulfill the purpose

Sold or Shared: Yes

Targeted Advertising: Yes

Third-parties: X Corp., LinkedIn Corporation, Google LLC, Google Ireland Limited, Microsoft Corporation, SendinBlue SAS

Identifiers

Sold or Shared

Targeted Advertising

Personal Data processed: First Name; Last Name; Email; Phone number + 5

Personal Information collected or disclosed: first name

- last name
- email
- telephone number

- company name
- website
- various types of data as specified in the service's privacy policy
- Tracking Tools
- Usage Data

Purposes:

- Contacting the User
- Platform and hosting services
- Managing contacts and sending messages

Retention period: for the time necessary to fulfill the purpose

Sold or Shared: Yes

Targeted Advertising: Yes

Third-parties: Shopify Inc., SendinBlue SAS

Commercial information

Sold or Shared

Targeted Advertising

Personal Data processed: Name; Surname; E-mail; Telephone number + 2

Personal Information collected or disclosed:

- name
- surname
- e-mail
- telephone number
- company name
- website

Purposes:

Contact the User

Retention period: for the time necessary to fulfill the purpose

Sold or Shared: Yes

Targeted Advertising: Yes

i You can read the definitions of these concepts inside the “[Definitions and legal references section](#)” of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities you can refer to the “[Your privacy rights under US state laws](#)” section of our privacy policy.

For more details on the collection of Personal Information, please read the section “[Detailed information on the processing of Personal Data](#)” of our privacy policy.

We won’t process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use this Website.

For example, you directly provide your Personal Information when you submit requests via any forms on this Website. You also provide Personal Information indirectly when you navigate this Website, as Personal Information about you is automatically observed and collected.

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

Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

-the right to access Personal Information: the right to know. You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;

-the right to correct inaccurate Personal Information. You have the right to request that we correct any inaccurate Personal Information we maintain about you;

-the right to request the deletion of your Personal Information. You have the right to request that we delete any of your Personal Information;

-the right to obtain a copy of your Personal Information. We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;

-the right to opt out from the Sale of your Personal Information; We will not discriminate against you for exercising your privacy rights.

-the right to non-discrimination.

Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have:

-The right to opt out of the Sharing of your Personal Information for cross-context behavioral advertising;

-The right to request to limit our use or disclosure of your Sensitive Personal Information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana you have

- The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer. In Maryland, your Sensitive Personal Information will be collected or processed only if strictly necessary to provide or maintain a specific product or service requested by you.

In Minnesota and Maryland Users also have the right to obtain a list of the specific third parties to which the controller has disclosed the consumer's personal data

* Note that in some states like Minnesota you have the following specific rights connected to profiling:

- The right to question the results of the profiling;
- The right to be informed of the reason that the profiling resulted in the decision; if feasible
- The right to be informed of what actions the consumer might have taken to secure a different decision and the actions that the consumer might take to secure a different decision in the future;
- The right to review personal data used in the profiling;
- If inaccurate, the right to have the data corrected and the profiling decision reevaluated based on the corrected data;

Additional rights for users residing in Utah and Iowa

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, you have:

- The right to opt out of** the processing of your Personal Information for **Targeted Advertising;**
- The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

How to exercise your privacy rights under US state laws

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

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

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

How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on this Website.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control (“GPC”), you are free to do so and we will abide by such request in a frictionless manner.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

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

Further information on data processing

Defense in court

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

The User declares to be aware that the Data Controller may be required to disclose personal data by order of public authorities.

Specific information

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

System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services used by it may collect system logs, which are files that record interactions and may also contain Personal Data, such as the User's IP address.

Information not contained in this policy

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

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if possible, on this Website and, if technically and legally feasible, by sending a notification to Users via any contact information available to the Data Controller. Please check this page frequently, referring to the date of the last modification indicated at the bottom.

If the changes affect processing based on consent, the Data Controller will collect the User's consent again, if necessary.

Definitions and legal references

Personal Data (or Data) / Personal Information (or Information)

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

Sensitive Personal Information

Sensitive Personal Information means any Personal Information that is not publicly available and that reveals information considered sensitive under applicable privacy legislation.

Usage Data

This information is collected automatically through this Website (including third-party applications integrated into this Website), including: IP addresses or domain names of computers utilized by the User who connects to this Website, URI (Uniform Resource Identifier) addresses, 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 response (successful, error, etc.), the country of origin, the characteristics of the browser and operating system utilized by the visitor, the various time details per visit (e.g., the time spent on each page), and the details of the path followed within the Application, with particular reference to the sequence of pages visited, and other parameters related to the operating system and 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 Processor)

The natural or legal person, public administration, or any other entity that processes Personal Data on

behalf of the Data 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 and the means used, 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 hardware or software tool by which the Personal Data of Users is collected and processed.

Service

The Service provided by this Website as defined in the applicable terms (if any) on this site/application.

Sale

A Sale means any exchange of Personal Information by the Owner to a third party, whether for monetary or other valuable consideration, as defined by applicable U.S. state privacy laws. Please note that exchanging Personal Information with a service provider pursuant to a written contract that meets the requirements set forth by applicable law does not constitute a Sale of your Personal Information.

Sharing

A Sharing means any sharing, rental, release, disclosure, dissemination, making available, transfer, or otherwise communicating, whether verbally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a

third party for cross-context behavioral advertising, whether for monetary or other valuable consideration, including transactions between a business and a third party relating to cross-context behavioral advertising to a business where no money is exchanged, as defined by California privacy laws. Please note that exchanging Personal Information with a service provider pursuant to a written contract that meets the requirements of California privacy laws does not constitute sharing your Personal Information.

Targeted Advertising

Targeted advertising means displaying ads to a consumer for whom the ad is selected based on Personal Information obtained from that consumer's activities over time and across unaffiliated websites or online applications to predict that consumer's preferences or interests, as defined by applicable U.S. state privacy law.

European Union (or EU)

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

Cookies

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

A Tracker means any technology—e.g., cookies, unique identifiers, web beacons, embedded scripts, e-tags, and fingerprinting—that allows Users to be tracked, for example, by collecting or storing information on the User's device.

Legal References

This policy is drafted based on multiple legislative systems.

Unless otherwise specified, this policy applies exclusively to this Website.

How can we help?

What you can do

Your data

- Ask us to know and access the information we have about you
- Ask us to correct the information we have about you
- Ask us to exercise the right to be forgotten (by deleting the information we have about you)
- Ask us to transfer the data to another service

In case of problems

While we strive to create a positive user experience, we understand that occasionally problems may arise between us and our users.

If this happens, please do not hesitate to contact us.

Contact Us

Footer

www.blueupbeacons.com

BlueUp Srl

Loc. Belvedere, Entrance 2

53034 Colle Val d'Elsa (SI)

ITALY

Data Controller Email Address: info@blueupbeacons.com

Privacy Policy

Last Updated: December 11, 2025

Cookie Policy

Last Updated: December 11, 2025