

**Last updated on May 28, 2025**

This Privacy Statement describes how Defoe manage personal information and respect your privacy. This policy may be amended from time to time. We encourage visitors and users of our sites to regularly review our Privacy Policy.

All "**Personal Information**" (which is defined as any information that identifies or can be used to identify, contact, or locate the person to whom such information pertains) that we collect and maintain will be subject to this Privacy Policy, as amended from time to time. To update your information and preferences, see the section entitled "[Updating Your Personal Information and Privacy Preferences.](#)"

"Defoe" acts as the controller or processor of your information, as explained in more detail in the "[Collecting Personal Information](#)" section below.

#### **PRIVACY SHIELD FRAMEWORK**

Defoe is committed to and it is responsible for the processing of personal data it receives and complies with the Privacy Shield Principles for all onward transfers of personal data. In certain situations, Defoe may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

#### **COLLECTION OF PERSONAL INFORMATION**

As a visitor to the Site, you can engage in many activities without providing any Personal Information.

However, when you register to a Defoe site and book our services, as a subscriber, in order to provide the services to you, we may collect the following Personal Information from you:

- Contact information such as your name, phone and fax numbers, address and email address; and
- Demographic information such as your job title, job description and company/institution name and company/institution type; and
- Profile data, including your username and password, details about your purchases

If you submit a request/content to Defoe, you may be asked to provide the following information:

- Contact information such as your name, phone number, primary address, and email address.
- Payment and contributor information including, but not limited to, payout method, payout email, and information about your profession.

Depending upon the activity, some of the information that we ask you to provide is identified as mandatory and some as voluntary. If you do not provide the mandatory data with respect to a particular activity, you will not be able to engage in that activity.

As is true of most websites, when you use the Site, Defoe or third party subprocessors contracted by Defoe may also collect certain technical and routing information about your computer to facilitate your use of the Site and its services.

In order to reduce errors in our database, authenticate our users, and prevent abuse of our system, we may on occasion supplement the Personal Information you submit to us with information from third-party sources. We may supplement your contact information with address information that we collect directly from you with information stored in third-party databases, such as demographic information or company information in order to make it more likely that any communications we send will be relevant and of interest to you. You may find a list of any third-party sub processors that we use to process information here below.

#### **UPDATING YOUR PERSONAL INFORMATION AND PRIVACY PREFERENCES**

Upon request Defoe will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information.

To request this information please contact us at [privacy@defoe.it](mailto:privacy@defoe.it)

You have the right to access and correct, or delete your Personal Information and privacy preferences at any time. This may be accomplished by entering your account where you can view and make changes to most of your Personal Information immediately. If you are a participant/contributor/abstract submitter, you can change your profile by using the credentials released at the moment of registration. In case you have forgotten or lost your credentials please contact us at [privacy@defoe.it](mailto:privacy@defoe.it).

We will respond to your request promptly within a reasonable timeframe.

#### **HOW YOUR PERSONAL INFORMATION IS USED**

Defoe collects your information in order to provide services to you, comply with our legal obligations, and to improve our services. We do not sell, rent or share your personally identifiable information to or with third parties in any way other than as disclosed in this Privacy Policy. Defoe may use this information to:

- Process your financial transactions
- Send you order / renewal confirmations
- Register your rights, if any, to technical support or other benefits that may be made available to registered users.
- Respond to customer service requests, questions and concerns
- Administer your account
- Provide you requested service information.
- Keep you informed about services of Defoe and selected third parties.
- Administer surveys you enter and notify you of the results
- Investigate, prevent or take action regarding illegal activities and/or violations of our Terms of Service.
- Meet our research and service development needs and to improve our Site, services and offerings; and

We tie your personally identifiable information, and/or your membership history in order to provide tailored information

In certain situations, Defoe may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose information about you if we determine that such disclosure should be made for reasons of national security, law enforcement, or other issues of public importance.

#### **INFORMATION SHARING WITH SERVICE PROVIDERS / AGENTS**

Defoe uses one outside credit card processing company to bill you for our services. To the best of our knowledge, this company does not retain, share, store or use personally identifiable information for any other purpose. Defoe does not see/manage your credit card number unless the same number is provided by fax or personally. In both cases, your credit card number will be used solely for the purpose of booking the requested service and will not be stored. We also share Personal Information with certain companies that perform services on our behalf. We only share the Personal Information which

is necessary for them to perform those services. We require any company with which we may share Personal Information to protect that data in a manner consistent with this policy and to limit the use of such Personal Information to the performance of services for Defoe. You may find a list of these third-party subprocessors below. We do not sell or otherwise provide Personal Information to other companies for the marketing of their own products or services.

#### **DATA RETENTION**

We will retain your information for as long as your account is active, your information is needed to provide you services, or as required to fulfill our legal obligations. If you wish to delete your account or request that we no longer use your information to provide you services contact us at [privacy@defoe.it](mailto:privacy@defoe.it). We will respond to your request within 30 days. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

#### **CHOICE / OPT OUT**

You may "opt out" of receiving Defoe's email updates, newsletters and/or partner emails by entering your profile on the Site and making the appropriate selections. The choice to opt out of such communications is also generally available during the sign-up process. Defoe will still contact you when there are changes to the Terms of Service or Submitter Terms of Service, as applicable. In addition, we will still send you service-related announcements including, but not limited to, a registration email, benefit notification emails, emails automatically triggered by actions you took on the Site and bill related notices. Generally, you may not opt-out of these communications, which are not promotional in nature. If you wish not to receive them, you have the option of deactivating your account. If you use a Defoe mobile app, we may send you push notifications from time-to-time in order to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you may turn them off at the device level.

#### **PROTECTION OF YOUR PERSONAL INFORMATION**

The Personal Information that you provide in connection with the use of the Site is protected in several ways.

- Access by you to your account profile is available through a password and unique customer ID selected by you. This password is encrypted. You should strive to use a strong, alpha-numeric password which you should not divulge to anyone.
- Your Personal Information resides on secure servers that only selected Defoe personnel and contractors have access to via password.
- Your Personal Information is encrypted whenever it is transmitted to Defoe.
- When you enter sensitive information (such as credit card number) on our registration or order forms, we encrypt that information using transport layer security technology

We strive to protect the Personal Information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we take into account the sensitivity of the Personal Information we collect, process and store, and the current state of technology to use these measures protect your Personal Information.

#### **COOKIE AND TRACKING TECHNOLOGIES**

The Site may automatically collect information as you browse, such as Internet Service Provider, browser type and version, operating system and device type, average time spent on our site(s), pages viewed, information accessed, the Internet Protocol (IP) address used to connect your computer to the Internet and other relevant statistics. Technologies such as: cookies, beacons, tags and scripts can be automatically used by google analytics services to provide site features and functionality. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. Normally, Defoe does not receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

A cookie is a small, unique text file that a website can send to your computer when you visit a site. We may use session cookies, which terminate when a user closes his or her browser, and/or persistent cookies, which remain on the user's computer until manually deleted. Most web browsers can either alert you to the use of cookies or refuse to accept cookies entirely. If you do not want us to deploy cookies to your browser, you can set your browser to reject cookies or to notify you when a website tries to put a cookie on your computer. Rejecting cookies may affect your ability to use the Site.

Please note that we cannot control the actions of others with whom you may choose to share your pages and information. Any information you post to a public bulletin board or chat room, such as Forum, is available to all persons accessing that location. To request removal of your personal information from our blog or community forum, contact us at [privacy@defoe.it](mailto:privacy@defoe.it). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why. Alternatively, if you used a third party application to post such information, you can remove it, by either logging into the said application and removing the information or by contacting the appropriate third party application.

Your email address will not automatically be posted on the Forums/Chats unless you modify the default setting to permit that. Your email address will then be available to all persons accessing the Forums/Chats.

#### **CHANGES IN PRIVACY POLICY**

Defoe reserves the right to amend the Privacy Policy from time to time at its sole discretion and will provide notice by email or on the home page of the Site when we make material changes to this Privacy Policy prior to the change becoming effective. If as the result of such changes, you want to alter the ways in which Defoe is allowed to use your Personal Information, you can do so by following the procedure described in the section entitled "Updating Your Personal Information and Privacy Preferences."

You will be deemed to have been made aware of, and will be subject to, any material changes to the Privacy Policy after such notice has been posted with the following exception: If at the time you provide Personal Information to Defoe you are given the opportunity (as you currently are) to limit how such information will be used to communicate with you, either by Defoe or by third parties, Defoe will not change your preference in this regard without your express consent. However, if Defoe is acquired by or merged with another entity, Defoe may provide to such entity customer information that is related to that part of our business that was sold to or merged with the other entity without your consent, but Defoe will provide notice of such asset sales, acquisitions, or mergers on this Site.

#### **LINKS TO THIRD PARTY SITES**

Our Site includes links to other Web sites whose privacy practices may differ from those of Defoe. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Web site you visit.

#### **SOCIAL MEDIA WIDGETS**

Our Web sites may include Social Media Features, such as the Facebook Like button and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

#### **SINGLE SIGN-ON**

You may be able to log in to our site using sign-in services such as Facebook Connect. These services will authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our sign up form. Services like Facebook Connect give you the option to post information about your activities on this Web site to your profile page to share with others within your network.

#### **REFERRAL PROGRAM EMAILS**

If you choose to use our referral service to tell a friend about our Site, we will ask you for your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to visit the Site. Defoe stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program. Your friend may contact [privacy@defoe.com](mailto:privacy@defoe.com) to request that we remove this information from our database.

#### **CHILDREN**

We do not intend to solicit or collect Personal Information from anyone under the age of 18. If you are under 18, do not enter information on this site or engage our services. If you believe a child of yours under the age of 18 has entered Personal Information please contact [privacy@defoe.it](mailto:privacy@defoe.it) to have the data removed and terminate the child's account.

#### **PRIVACY COMPLAINTS**

Subject to any exemptions provided by law, you have the right to request access to Information, as well as to seek to update, delete or correct this Information. To the extent that Defoe's processing of your Personal Data is subject to the EU General Data Protection Regulation, Defoe relies on its legitimate interests, described above, to process your data. You have a right to object to Defoe's use of your Personal Data at any time by updating your profile and opting out from receiving all emails. If you are a contributor/participant/faculty member/abstract submitter You may object to processing by emailing [privacy@defoe.it](mailto:privacy@defoe.it). Defoe takes its users' privacy concerns seriously. If you believe that Defoe has not complied with this Privacy Policy with respect to your Personal Information, you may contact the internal officer responsible for treatment (Mrs Natalia Trotta) [privacy@defoe.it](mailto:privacy@defoe.it).

In your letter please describe in as much detail as possible the ways in which you believe that the Defoe Privacy Policy has not been complied with. We will investigate your complaint promptly.

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this Web site, you can contact us at [privacy@defoe.it](mailto:privacy@defoe.it)

#### **Defoe srl**

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