

Privacy Policy of www.leetspark.com

Welcome to the privacy policy of www.leetspark.com. This policy will help you understand what data we collect, why we collect it, and what your rights are in relation to it.

Latest update: May 22, 2026

Table of contents

Owner and Data Controller

Types of Data collected

Mode and place of processing the Data

The purposes of processing

Detailed information on the processing of Personal Data

Information on opting out of interest-based advertising

Cookie Policy

Further Information for Users in the European Union

Additional information about Data collection and processing

Definitions and legal references

Owner and Data Controller

Nicola Centrone

Via Monte Ceneri, 10 20900 Monza (MB) Italy

Owner contact email: legal@leetspark.com

Type of Data we collect

Among the types of Personal Data that this Website collects, by itself or through third parties, there are:

- email address
- Usage Data
- Trackers
- device information
- IP address
- browser information
- number of Users
- session statistics

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.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website.

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.

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.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

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

- Contacting the User
- Managing contacts and sending messages
- Advertising
- Remarketing and behavioral targeting
- Platform services and hosting
- Spam and bots protection
- Analytics

Detailed information on the processing of Personal Data

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. For more information, please check the privacy policies of the relevant services.

Meta ads conversion tracking (Meta pixel)

Company: Meta Platforms, Inc. – [Privacy Policy](#) – [Opt Out](#)

Place of processing: United States

Personal Data processed: Trackers (Cookies) and Usage Data.

Meta ads conversion tracking (Meta pixel) is an analytics and behavioral targeting service provided by Meta Platforms, Inc. It connects data from the Meta advertising network with the specific actions performed by Users on this Website. The Meta pixel tracks conversions, page views, and interactions that can be attributed to advertisements running on Facebook, Instagram, and the Meta Audience Network. This allows the Owner to measure the effectiveness of ad campaigns and optimize marketing strategies.

This service operates directly within the User's browser via page scripts. It is strictly subject to prior consent and will remain blocked until the User explicitly accepts Marketing trackers through the Cookie Banner available on this Website.

Trackers deployed: _fbp (90 days), _fbc (3 months), fr (3 months), lastExternalReferrer (session), lastExternalReferrerTime (session).

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 4

Company: Google Ireland Limited – [Privacy Policy](#) – [Opt Out](#)

Place of processing: Ireland

Personal Data processed: Trackers (Cookies), Usage Data, number of Users, and session statistics.

Google Analytics 4 is a web analysis service provided by Google Ireland Limited (“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. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. This service operates directly within the User's browser via page scripts. It is strictly subject to prior consent and will remain completely blocked until the User explicitly accepts Measurement trackers through the Cookie Banner available on this Website. The duration of the deployed trackers may vary or decrease based on the user's specific browser settings.

Trackers deployed: _ga (13 months), _ga_* (13 months).

Contacting the User

Mailing list or newsletter

Company: this Website

Personal Data processed: Email address, Trackers (Email open pixels), and Usage Data.

By registering on the mailing list or for the newsletter via the "Get VIP access" form, the User's email address will be added to the contact list of those who may receive email messages containing information of a commercial or promotional nature concerning this Website. Your email address is added to this list solely as a result of giving explicit, free, and optional consent through the dedicated checkbox during registration.

The service processes basic usage statistics and technical trackers integrated within the emails to measure delivery, open rates, and user engagement.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts to communicate with the User.

These services process basic usage statistics and technical trackers integrated within the emails to measure delivery, open rates, and user engagement (such as when the message was viewed by the User, or when the User interacted with it by clicking on links included in the message).

Personal Data processed: Email address, Trackers (Email open pixels), and Usage Data.

Mailchimp

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Service provided by: Intuit Inc. (United States) – [Privacy Policy](#)

Place of processing: United States

Personal Data processed: Email address, Trackers (Email open pixels), and Usage Data.

Platform services and hosting

These services have the purpose of hosting and running key components of this Website, therefore allowing its provision and technical functionality. Such platforms provide essential infrastructure tools to the Owner that imply the collection and handling of technical Personal Data strictly necessary for the operation and security of the site. Some of these services may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Aruba Hosting

Aruba Hosting is a hosting service provided by Aruba S.p.A.

Service provided by: Aruba S.p.A. (Italy) – Privacy Policy

Place of processing: Italy (European Union)

Personal Data processed: Device information and Usage Data.

Remarketing and behavioral targeting via Customer Lists

This type of service allows this Website and its partners to inform, optimize and serve advertising based on the Personal Data voluntarily provided by the User.

Meta Custom Audience (Lookalike & Exclusion List)

Meta Custom Audience is a service provided by Meta Platforms, Inc. This service is used exclusively for Users who have granted explicit consent via the "Support the launch" feature on this Website. In such cases, the User's email address is processed on the Meta advertising network to exclude existing subscribers from seeing redundant advertisements, while safely helping the Owner identify prospective new users with shared interests (Lookalike Audiences).

Users can object to this processing at any time by contacting the Data Controller directly at legal@leetspark.com to request the removal of their email from future marketing lists. Additionally, Users can manage their ad personalization preferences and opt out of custom audience targeting directly within their personal Meta (Facebook/Instagram) account settings.

Service provided by: Meta Platforms, Inc. (United States) – [Privacy Policy](#) – [Opt out](#)

Place of processing: United States

Personal Data processed: Email address.

Spam and bots 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 or malicious activity.

Cloudflare Turnstile

Cloudflare Turnstile is a spam and bot protection service provided by Cloudflare, Inc.

Service provided by: Cloudflare, Inc. (United States) – Privacy Policy

Place of processing: United States

Personal Data processed: IP address, Browser information, and technical Usage Data.

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Cookie Policy

This Website uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

Further Information for Users in the European Union

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.
- 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.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

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 fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of 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 rights of Users based on the General Data Protection Regulation (GDPR)

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

In particular, Users have the right to do the following, to the extent permitted by law:

- **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.
- **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 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 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.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including 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.

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, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. 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. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

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) or 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.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying 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. Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

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 Processor)

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.

Cookie

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

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

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

How can we help?

What you can do

Your data

- Ask us to know and access the information we hold on you
- Ask us to correct information we hold on you
- Ask us to be forgotten (delete the information we hold on you)
- Ask to port your data to another service

In case of issues

While we strive to create a positive user experience, we understand that issues may occasionally arise between us and our users. If this is the case, please feel free to contact us at legal@leetspark.com

Footer

www.leetspark.com

Nicola Centrone Via Monte Ceneri, 10 20900 Monza (MB) Italy

Owner contact email: legal@leetspark.com

Privacy Policy by **iubenda**