

WEBSITE PRIVACY AND COOKIE POLICY

This Website Privacy and Cookie Policy ("Policy") applies to the processing of the personal data collected by Bending Spoons S.p.A. ("Bending Spoons", "we" or "us"), the parent company of Splice Video Editor S.r.l. ("SVE"), through the "developer.remini.ai" website ("Website") or when a Customer's End User uses a product or service integrated with Remini API in accordance with Regulation (EU) 2016/679 – General Data Protection Regulation ("GDPR"), the Italian Legislative Decree 196/2003, Directive 2002/58/EC – ePrivacy Directive, and other applicable local laws ("Applicable Privacy Laws").

Please refer to the privacy policy that applies to the [Remini mobile app for Android or iOS](#) for information on how we process your personal data, treat your information and protect your privacy when you use the Remini mobile app.

Capitalized words shall have the meaning assigned to them in the Agreement between SVE and Customer.

1. Data Controller and Data Protection Officer

The Data Controller is Bending Spoons S.p.A., based in Corso Como 15, 20154 Milan, Italy, VAT, tax code and number of registration with the Milan Monza Brianza Lodi Company Register 08931860962, and REA number MI 2056926. For any requests regarding the processing of your personal data, please email us at privacy@bendingspoons.com.

Our Data Protection Officer can be contacted for any requests relating to the processing of your personal data or this Policy by sending an email to dpo@bendingspoons.com.

2. Categories of personal data that we collect, purposes and legal bases for our processing

We process the following categories of personal data, for the purposes and on the legal bases indicated below. Please note that not all of the below information may be deemed personal data in your jurisdiction in all cases.

Purpose	Legal Basis	Categories of Processed Data
a. To enable you to use the Website, and to process any requests you send to us when you contact us; to enable you to create an account and to authenticate your access to your account, to request an	Processing is necessary to take steps at your request prior to entering into a contract (art. 6(1)(b) of the GDPR).	Identifiers and internet and network activity information, identification and contact information (such as email address); contact information (such as name and email address); the API key; payment information (such as payment provider,

Purpose	Legal Basis	Categories of Processed Data
API key and to purchase credits.		duration of subscription, price); the information you provide us when you submit a request for information or when you contact our customer support.
b. To comply with our legal obligations, including requests from public authorities.	Compliance with a legal obligation to which we are subject (art. 6(1)(c) of the GDPR), and our legitimate interest (art. 6(1)(f) of the GDPR) to carry out processing activities for this purpose.	Any information which may be required by law or under the instructions of public authorities. To comply with tax legislation, we may process personal data necessary to determine your location, such as billing address, IP address, location of the bank account used for a payment or billing address of the customer held by that bank.
c. To establish, exercise or defend our rights and those of our employees, and to carry out corporate transactions or operations (for example, in case of bankruptcy, merger, acquisition, reorganization, sale of assets or assignments, and due diligence related to any transaction).	The legal basis for the processing is the performance of our contractual relationship (art. 6(1)(b) of GDPR).	Any information necessary for the performance of such purpose.

Purpose	Legal Basis	Categories of Processed Data
<p>d. To process and respond to customer support communications and to requests for information you may raise with us.</p>	<p>The legal basis for the processing is the performance of our contractual relationship (art. 6(1)(b) of the GDPR).</p>	<p>Identification and contact information you provide us (such as first and last name, email address) and the content of your communication or request.</p>
<p>e. To ensure the quality and the proper functioning of the services by analyzing, preventing or correcting failures and bugs, illicit use or misuse of the services.</p>	<p>The legal basis for the processing is our legitimate interest (art. 6(1)(f) of the GDPR) to ensure the quality and the proper functioning of the services.</p>	<p>Identifiers, Internet and network activity information (such as IP address, device model, device type, OS version, crash and error logs), inferences we generate, images, videos and audio-recordings uploaded by you, and other related information about your usage of Remini API.</p>
<p>f. To improve our products and services (for example, by conducting statistical analysis or other research activities to optimize our features and provide you with new ones).</p>	<p>The legal basis for the processing is our legitimate interest (art. 6(1)(f) of the GDPR) to improve our products and services.</p>	<p>Identifiers (such as name, email address), Internet and network activity information (such as IP address), and information collected about your use of Remini's API (such as effect chosen and number of successful exports).</p> <p>For the purpose of statistical analysis, we may also collect information and metadata related to your images, videos and audio-recordings.</p>

To know how we process your data through the use of cookies, see [section 9 \(Cookies\)](#) below.

3. Data Retention

Personal data may be processed by both automated and non-automated means and may be stored at our premises and on our service providers' servers. We adopt technical and organizational measures designed to prevent the loss, improper use and alteration of your personal data. In some cases, we may also adopt data encryption and pseudonymization measures. However, transmissions over the Internet are never 100% secure, and you should not provide any personal data if you want to avoid any risk.

Personal data processed for the purposes referred to in Section 2.a) and 2.d) will be kept for a period not exceeding the one necessary for the said purposes and, in each case, for no more than 3 years from the date of your last interaction with the Website.

Personal data processed for the purposes referred to in Section 2.b) will be kept up to 5 years from the date of your last interaction with the Website.

Personal data processed for the purposes referred to in 2.c) will be kept up to 10 years from the date of your last interaction with the Website.

Personal data processed for the purpose referred to in Section 2.e) will be retained for a period not exceeding the one necessary for the said purposes and, in each case, for no more than 1 year from the date of your last interaction with Remini API or from the date of the expiration of your subscription unless you access the account after then. In this case, the retention period will start from the date of your last interaction with the account.

Personal data processed for the purpose referred to in Section 2.f) will be retained for a period not exceeding the one necessary for the said purposes and, in each case, for no more than 3 years from the date of your last interaction with Remini API or from the date of the expiration of your subscription unless you access the account after then. In this case, the retention period will start from the date of your last interaction with the account.

Except for any legal obligation that sets a longer data retention period, at the end of these periods, the personal data processed will be deleted or anonymized.

To know how long your data is stored through cookies, see [section 9 \(Cookies\)](#) below.

4. Your Choices

Providing navigation data is necessary if you want to navigate and interact with our Website. Same goes for the information you share with us when you contact us to request information or support. You can freely decide whether to accept cookies and other tracking technologies not strictly necessary for the functioning of the Website as indicated in section 9 (Cookies) below.

5. Sharing Your Personal Data

We may share or disclose your personal data to the following categories of recipients:

- Vendors carrying out activities that are related or instrumental to our business and operational activities as outsourced data processors appointed in writing in accordance with Applicable Privacy Laws, or acting as autonomous data controllers (such as IT or storage service providers, mobile measurement partners, suppliers of mobile marketing services).
- If we carry out a corporate transaction or operation (for example, in case of bankruptcy, merger, acquisition, reorganization, sale of assets or assignments, and

due diligence related to any such transactions), your personal data may be disclosed to our advisers and any prospective purchaser's advisers, and may be one of the assets that is transferred to another owner.

- Public, judicial or police authorities, within the limits set by applicable laws.

Your data can also be collected by third parties when you accept third party cookies. Please see [section 9 \(Cookies\)](#) below for more information.

Personal data will not be disclosed for any reason other than those stated above, unless such disclosure is deemed necessary for the fulfillment of a legal obligation or if we request your consent.

6. Transfers of Personal Data Outside the European Economic Area

We may transfer personal data from the European Economic Area (“EEA”), the UK or Switzerland to other countries outside the EEA. Such data transfers are based on appropriate safeguards in accordance with Applicable Privacy Laws, including (a) the standard contractual clauses developed by the European Commission; (b) the decisions of adequacy of the European Commission; or (c) binding corporate rules.

More information on the appropriate warranties is available for consultation by sending an email to privacy@bendingspoons.com.

7. Your Rights

At any time and free of charge, you can exercise the following rights, as specified and subject to certain limitations and exceptions under Applicable Privacy Laws:

- Right of access. You have the right to obtain information about the processing of your personal data and to access it.
- Right to rectification. You have the right to ask for the updating, rectification or integration of your personal data.
- Right to erasure. You have the right to request the deletion of your personal data.
- Right to restriction of processing. You have the right to request the restriction of the processing of your personal data.
- Right to data portability. You have the right to obtain a portable electronic copy of your personal data.
- Right to object. Where we rely on our legitimate interest to process your personal data, you have the right to object to such processing, wholly or partly, on grounds related to your particular situation. In particular, you are entitled to object to the processing of your personal data for direct marketing purposes, including profiling.
- Right to withdraw your consent. Where we rely on your consent to process your personal data, you have the right to withdraw your consent, although the processing carried out before your withdrawal of consent will remain valid.

You also have the right to lodge a complaint before the competent national Data Protection Authority, in particular before the Data Protection Authority of the Member State of your habitual residence, place of work or place of the alleged infringement.

To exercise your rights, or if you have any other questions about privacy or data protection at Bending Spoons, you can contact us by sending an email to privacy@bendingspoons.com. We may take reasonable steps to verify your identity prior to responding to your request.

8. Third-Party Websites and Services

The website or web app may include links to other websites or services operated by third parties. The activities described in this Policy do not apply to data processed by such third-party websites and services. We have no control over, and we are not responsible for, the actions and privacy policies of third parties and other websites and services.

9. Cookies

What are cookies and tracking technologies?

When we use the word “cookies” in this Policy, we mean any tracking technology that stores or accesses information on the user’s device, including any SDK, tracking pixel, HTML5 local storage, local shared object, and fingerprinting technique.

Cookies are usually classified:

- (A) by purpose (Technical cookies, Analytics cookies, Profiling cookies);
- (B) by publisher (First-party cookies, Third-party cookies); and
- (C) by duration (Session cookies, Permanent cookies).

This classification is important because different legal requirements apply based on how the cookie is classified.

Below you will find the types of cookies and tracking technologies as classified with some practical examples.

A. By purpose

Technical cookies

Technical cookies are used solely for the purpose of transmitting messages over an electronic communication network, or to provide a service specifically requested by the user.

In other words, technical cookies are essential for the correct functioning of the website and to provide the service offered to and requested by the user.

For example, technical cookies can be used to monitor sessions, to store specific server access information related to the user configuration, to facilitate the use of online content, or to keep track of items in a shopping cart or information used to fill in a form.

Technical cookies include the functional cookies you might find mentioned while browsing the Website.

Technical cookies do not need your consent.

Analytics cookies

Analytics cookies may be used to assess the effectiveness of an information society service provided by a publisher, to evaluate and improve the design of a website or to help measure its traffic.

In other words, analytics cookies may be used to track the traffic and performance of a website, by collecting aggregate data on the number of visitors and how they interact with the website to improve its services.

For example, analytics cookies may collect information about how users access a website, including the number of visitors, possibly grouped by geographical area, time slot, how long visitors stay on the site for, what parts of the site they visit or other characteristics, the number of pages visited or the number of users who viewed a particular section.

Please consider that if analytics cookies are properly anonymized, they can be installed without your previous explicit consent.

Profiling cookies

Profiling cookies may be used to trace specific actions or recurring behavioral patterns in the use of the offered functionalities back to specific, identified or identifiable individuals for the purpose of grouping the different profiles within homogeneous, multi-sized clusters. This is aimed in turn to enable a company to provide increasingly customized services beyond what is strictly necessary for the delivery of the service and also send targeted advertising messages in line with the preferences expressed by the user during their web-browsing activities.

In other words, profiling cookies may be used to convey behavioral advertising, measure the effectiveness of ads, or to customize the services offered in line with the user's monitored behavior.

For example, profiling cookies can be used to create user profiles and offer content in line with the user's interests, or to send targeted ads or messages.

Profiling cookies include the performance, marketing and social media cookies you might find mentioned while browsing the Website.

Profiling cookies need your explicit consent.

B. By publisher

First-party cookies

Cookies are installed directly by the website that the user is browsing. In other words, the publisher of the website installs the cookies directly without using any third-party publishers and processes the information thereby acquired.

Third-party cookies

Third-party cookies are set by external providers other than those of the website that the user is browsing. In other words, the publisher of the website installs the cookies indirectly, using third-party publishers and processes the information thereby acquired.

For the purposes of this Policy, third party cookies include any tracker which, although directly published by us, is provided by third parties which receive or otherwise process for their own purposes the information acquired through these cookies when you visit the Website. For further information, please refer to the privacy policy of such third party as indicated in the cookie table.

The data collected by these third parties is governed by their own specific privacy policies, terms and conditions, or cookie policies to which we have no control over.

When our website hosts third-party non-anonymized analytics cookies and/or profiling cookies, you will be asked to consent to such third-party cookies when landing on our websites for the first time, via a specific cookie banner.

You can manage and delete these third-party cookies at any time by accessing the privacy policies of the third parties as indicated in the following section ("*Types of cookies used by the Website*").

C. By duration

Session cookies

Session cookies expire when the user's browsing session expires.

Permanent cookies

Permanent cookies last longer than a single browsing session.

Types of cookies used by the Website

This Website installs the following types of cookies. You can customize your cookie preferences at any time by accessing the cookie management platform on our website.

Technical cookies

Provider (i.e., first party or third-party)	Name	Retention period	Purpose	Third-party Privacy Policy (where appropriate)
stripe.com	__stripe_sid	1 year	Fraud prevention	https://stripe.com/it/privacy
stripe.com	Stripe JS	1 year	Fraud prevention	https://stripe.com/it/privacy
stripe.com	_guid	2 years	Fraud prevention	https://stripe.com/it/privacy
stripe.com	__stripe_mid	1 year	Fraud prevention	https://stripe.com/it/privacy
stripe.com	m	2 years	Fraud prevention	https://stripe.com/it/privacy
firebase.google.com	Firebase Authentication	180 days	Enable user authentication and facilitate user account management	https://policies.google.com/privacy

onetrust.com	OptanonConsent	1 year	prevent cookies in each category from being set in the users browser, when consent is not given	https://www.onetrust.com/privacy-notice/
onetrust.com	OptanonAlertBoxClosed	1 year	not show the message more than once to a user.	https://www.onetrust.com/privacy-notice/

Analytics cookies

Provider (i.e., first party or third-party)	Name	Retention period	Purpose	Third-party Privacy Policy (where appropriate)
sentry.io	Sentry JavaScript SDK	90 days	Trace and capture technical issues	https://sentry.io/privacy/
hotjar.com	hjSession_xxxxxx	A few seconds	Hold current session data	https://www.hotjar.com/legal/policies/privacy/
hotjar.com	hjTLDDTest	Session	Determine the most generic cookie path that	https://www.hotjar.com/legal/policies/privacy/

			can be used	
hotjar.com	hjFirstSeen	A few seconds	Identify a new user's first session on a website	https://www.hotjar.com/legal/policies/privacy/
hotjar.com	_hjIncludedInSessionSample	A few seconds	Let us know whether a visitor is included in the data sampling defined by the Website's daily session limit	https://www.hotjar.com/legal/policies/privacy/
hotjar.com	_hjAbsoluteSessionInProgress	A few seconds	Detect first pageview session of a user	https://www.hotjar.com/legal/policies/privacy/
hotjar.com	_hjSessionUser_XXXX - 1 year	1 year	Persist the HotJar USER ID	https://www.hotjar.com/legal/policies/privacy/

Cookie settings

You can also disable (in whole or in part) technical cookies through the specific functions of your browser. Please note, however, that if you don't allow technical cookies, you may not be able to use the Website, view its contents and take advantage of its services. Inhibiting technical cookies may result in some services or features of the Website not being available or not working properly and you may be required to modify or manually enter certain information or preferences each time you visit the Website.

The choices you make with respect to the Website's cookies will be recorded in a cookie. However, in some circumstances this cookie may not work properly: in such cases, we recommend that you delete the cookies you do not like and inhibit their use through the features of your browser.

Your cookie preferences will need to be reset if you use different devices or browsers to access the Website.

You can find information on how to manage cookie settings on certain browsers via the following links:

- [Chrome](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Safari](#)

For more information about how to limit the use of third-party cookies installed in your browser, please visit www.youronlinechoices.com. Once arrived on the website, by accessing the "Your ad choices" section, you will be able to view the list of third parties that install cookies on your browser and manage your consent granularly ("On/Off"). Moreover, by expanding the "Info" section, you will be able to access to more information about each third party and its privacy and cookie policies.

With regards to your rights under applicable Data Protection Laws, please refer to Section 7 above.

10. Changes

We may modify, integrate or update, in whole or in part, this Policy, and we will notify users of any modification, integration or update in accordance with Applicable Privacy Laws. If we make modifications, we will notify you by revising the date at the bottom of this Policy and, under certain circumstances, we may also notify you by additional means such as pop-up or push notifications within the web app or our website, or email.

Last updated: 22 June 2023