

# Privacy Policy

Effective from: July 10, 2025

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**Please note:** This Privacy Policy is a translation of the original Italian version, available at <https://ciaobot.eu/privacy-policy/it>. While we strive for accuracy, this translation is provided for informational purposes only and has no legal value. In case of discrepancies, the Italian version shall prevail.

This Privacy Policy describes how the personal data of users who use the CiaoBot bot is collected, used, and protected.

## 1. Changes to the Privacy Policy

This Privacy Policy may be subject to changes over time. The link to the Privacy Policy will be updated each time a change is made. Users can access the most recent version of the Privacy Policy via the bot's slash commands, such as /privacy, at the direct link <https://ciaobot.eu/privacy-policy>, or through the Discord App Directory if the bot is listed there. While direct notifications to users are not planned for each update, such changes may be announced in the update channel of the support Discord server at the following link: <https://discord.gg/UbV46Wqa3D>. Users are therefore encouraged to periodically check the provided link and the update channel to stay informed about any changes.

## 2. Data Collected

We store only certain information obtained through the use of CiaoBot commands. The data collected includes:

- **Technical data:** such as server ID, user ID, and options selected when using configuration commands for specific CiaoBot features.
- **Activity data within the bot:** In the case of game commands, we store the match result (win, loss, or draw), along with the user ID and the server ID where the game took place, for leaderboard and statistics management. This information may be used for global, server-specific, or personal rankings and statistics.
- **Ticket data:** If a server admin sets up a link-based system for ticket transcripts, we store all messages sent within the ticket in order to provide an online transcript accessible via a link. If a user wishes to have the ticket transcript deleted, they must contact support either via the support Discord server <https://discord.gg/UbV46Wqa3D> (recommended) or by email at [support@ciaobot.eu](mailto:support@ciaobot.eu). Server administrators or users can avoid message storage when a ticket is closed in two ways:
  1. **Do not use the ticket system.**
  2. **Set transcripts to "file" mode:** In this mode, when the ticket is closed, the bot will send an HTML file containing the transcript to the user who opened the ticket and to the server staff, without storing it online. On the other hand, if the **"link" mode is selected for transcripts**, the messages will be stored online and will be accessible via a link, only after the user links their Discord account to <https://ciaobot.eu>.

This ensures that only users who have access to the ticket are able to view its contents.

We reserve the right to retain any information entered into a CiaoBot command when necessary for the proper functioning of the bot's features. We do not intentionally collect sensitive data or personally identifiable information such as email addresses, phone numbers, or payment details.

However, if a user voluntarily includes such information in a ticket, and the transcript is saved in "link" mode, this content may be stored. In such cases, users are responsible for avoiding the inclusion of sensitive or personal data in tickets.

### 3. Purpose of Data Processing

The data collected is used exclusively to ensure the proper functioning of the bot's specific features, including leaderboards, statistics, welcome messages, tickets, and other systems. When necessary, the data may also be used to monitor the service, ensure security, or provide technical support to users.

### 4. Data Sharing

CiaoBot does not share personal data with third parties, except to comply with legal obligations or requests from competent authorities. Data is stored on MongoDB Atlas, a database service provider, whose servers are located in AWS (Amazon Web Services) Paris (eu-west-3).

### 5. User Rights

Users have the following rights regarding their personal data:

- **Right of access and portability:** Users can access their personal data collected during the use of the bot and receive it in a structured, commonly used, and machine-readable format such as JSON, PDF, or TXT. To make a data access request, users must open a ticket on our support Discord server: <https://discord.gg/UbV46Wqa3D>.
- **Right to rectification:** Users can correct any inaccurate data. To do so, they can re-execute the commands of the bot functions that generated the incorrect data. If the issue persists, users are invited to open a ticket on our support Discord server: <https://discord.gg/UbV46Wqa3D> (recommended) or contact us via support email: [support@ciaobot.eu](mailto:support@ciaobot.eu).
- **Right to erasure:** Users can request the deletion of their personal data. Generally, this can be done via a slash command of the bot. If no slash command is available for data deletion, users will need to contact support by opening a ticket on the support Discord server: <https://discord.gg/UbV46Wqa3D>. Upon receiving a deletion request, data will be removed from the bot's databases as soon as possible.
- **Right to verify deletion:** Users can verify the actual deletion of their data after requesting erasure, as sometimes due to bot errors data may not be deleted. To do so, they must open a ticket on the support Discord server: <https://discord.gg/UbV46Wqa3D>.
- **Right to object:** Users may choose not to use certain bot functions to prevent data collection. For example, if they do not want to appear in game

leaderboards, they simply need to avoid using the bot's game features. We will not implement data processing restrictions for these specific reasons.

## 6. Data Retention

User and server data are retained as follows:

- **User data:** Collected data is retained as long as the user is a member of at least one server using the bot. If the user is no longer present in any server with CiaoBot, their data will be deleted within a maximum of 30 days. If the user rejoins a server with CiaoBot before the 30-day period expires, the deletion is canceled.
- **User data related to a single server:** User data associated with a specific server is deleted within 30 days after the user leaves that server. If the user rejoins the server before the 30-day period expires, the deletion is canceled.
- **Server data:** Server-related data is deleted within 30 days after the bot is removed from the server. If the bot is re-added to the server before the 30-day period expires, the deletion is canceled.
- **Ticket data:** Ticket data (if saved via the "link" mode) is retained until the user or the server administrator requests its deletion by opening a ticket on the support Discord server (<https://discord.gg/UbV46Wqa3D>). If the bot is removed from the server, data related to all tickets on that server will be deleted within 30 days. If the bot is re-added before the 30-day period expires, the deletion is canceled.
- **Deletion upon request:** Users can request immediate deletion of their personal data as described in section 5 of this Privacy Policy, even if the situations described above do not apply.

Data may be deleted earlier than 30 days depending on the type of data.

However, in the presence of legal obligations or specific requirements, data retention may be extended only for the time strictly necessary to comply with such obligations or requirements.

If data is not deleted within 30 days, the user or server administrator is asked to contact support via the Discord server: <https://discord.gg/UbV46Wqa3D> (recommended) or via support email: [support@ciaobot.eu](mailto:support@ciaobot.eu).

## 7. Data Security

CiaoBot adopts standard technical measures to protect personal data from unauthorized access, loss, or destruction. However, despite these measures, absolute security of data transmitted or stored online cannot be guaranteed. Data is stored on MongoDB Atlas, with servers located at AWS (Amazon Web Services) Paris (eu-west-3), using AWS-provided At-Rest encryption.

## 8. Limitations and Liability

The use of the CiaoBot bot is subject to Discord's Terms of Service, available at: <https://discord.com/terms>. The primary responsibility for ensuring that users meet the minimum age requirement lies with their parents or legal guardians. If we become aware that a user is under 14 years old, we will report them to Discord authorities, suspend access to the bot, and delete the related data. We will never

use the data collected by the bot to verify whether a user is violating Discord's Terms of Service, the bot's Terms of Service, or applicable local laws, except in cases where we receive a report or have reasonable grounds to believe such terms or laws have been violated.

## 9. Contact Information

For questions or clarifications regarding this Privacy Policy, users can contact the data controller through the following channels:

- **Support Discord server:** <https://discord.gg/UbV46Wqa3D>
- **Discord contact:** @ciao287
- **Contact email:** [support@ciaobot.eu](mailto:support@ciaobot.eu) (please note that there is no guaranteed response time for email requests, as the main support channel remains the Discord server).

The data management service provider used by CiaoBot is **MongoDB Atlas**, which is responsible for storing and managing the collected data. For more information on their data protection policies, please refer directly to their Privacy Policy at: <https://www.mongodb.com/legal/privacy-policy>.