

## Cookie Policy

### Regulation (EU) no. 2016/679 ("GDPR")

Dotweb S.r.l. (hereinafter "Dotweb") protects the confidentiality of personal data and guarantees its necessary protection against any event that may put it at risk of violation.

As provided for in European Union Regulation no. 2016/679 ("GDPR") and in the regulations in force regarding the processing of personal data, the user ("Data Subject") is provided with information on "*cookies*".

#### SECTION I

##### Who we are and what data we process (art. 13, paragraph 1, letters a-b, of the GDPR)

Through its pro tem legal representative, Dotweb S.r.l., with registered office in Via degli Orti Oricellari 8d, Firenze (FI), Italy, acts as the Data Controller and may be contacted at the address [privacy@staff.aruba.it](mailto:privacy@staff.aruba.it).

The Data Controller has appointed a Data Protection Officer (DPO) who can be contacted for any information and requests at:

e-mail: [dpo@staff.aruba.it](mailto:dpo@staff.aruba.it)

Telephone number: +39 0575/0505

For any information or requests, please contact the following address

[privacy@staff.aruba.it](mailto:privacy@staff.aruba.it)

Telephone number: +39 0575/0505

*Cookies* may collect information and personal data such as IP address, nationality, town, date/time, device, browser, operating system, screen resolution, browsing route, pages visited and number of pages, duration of the visit, number of visits made.

The use of third-party *cookies* is governed by the rules drawn up by said third parties; the Data Subject is therefore asked to consult the policies on the processing of personal data as published on the websites referred to in Section II below, under the heading "Third-party *cookies*".

#### SECTION II

##### What are *cookies*

*Cookies* are small strings of text that sites visited by the user send to his/her terminal (usually to the *browser*), where they are stored so that they can be retransmitted to those sites on the user's next visit. When browsing a site, the user may also receive *cookies* on his/her terminal that are sent from different sites or *web servers* (so-called "third parties"), on which certain elements (such as, for example, images, maps, sounds, specific *links* to pages of other domains) on the site that he/she is visiting, may reside.

Two macro-categories of *cookies* can be distinguished: "technical" *cookies* and "profiling" *cookies*.

**Technical *cookies*** facilitate normal browsing and use of the website (for example, making it possible to make a purchase or authenticating access to restricted areas). If such *cookies* are not accepted, it would not be possible to carry out certain operations or these would be more complex and/or less secure; for these purposes, *cookies* that make it possible, for example, to identify or ensure the continued identification of the user within the session are essential.

**Profiling *cookies*** are aimed at creating profiles related to the user and can be used to send advertising messages in line with the preferences expressed by the user, or for detailed analyses or reports relating to the same in the context of browsing the network.

##### How we use *cookies*

Technical *cookies*, third-party *cookies* and, if the Data Subject has given explicit and informed consent, profiling *cookies*, can be installed from our website or from the corresponding subdomains.

In all cases the user may, at any time, manage or request the general disabling or deletion of *cookies* by altering the settings on his/her internet *browser*. However, this disabling may slow down or prevent access to certain parts of the site or affect how browsing functions.

The settings for managing or disabling *cookies* may vary depending on the internet browser used; therefore, for more information on how to carry out these operations, we suggest that the User consult the manual for his/her own device or the "Help" function on his/her internet browser.

Below are links that show how to manage or disable *cookies* for the most common internet browsers used:

- Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
- Safari: <https://www.apple.com/legal/privacy/en-ww/cookie>

### **Purpose, disabling and management of *cookies*** (art. 13, paragraph 1, letter c, of the GDPR)

#### **Technical, functional technical and technical analytics *cookies***

The use of technical *cookies*, i.e. *cookies* necessary for the transmission of communications via the electronic communications network, or *cookies* strictly necessary so that the supplier can provide the service required by the customer, make it possible to use our site securely and efficiently.

Session *cookies* may be installed to facilitate access to and continued presence in the restricted area of the portal as an authenticated user.

Technical *cookies* are essential for the correct functioning of our website and are used to allow users access to normal browsing and the possibility of using the advanced services available on our website. The technical *cookies* used are divided into session *cookies*, which are only stored for the duration of the visit until the browser is closed, and persistent *cookies*, which are saved in the memory of the user's device until they expire or are deleted by the user.

Our site uses the following technical *cookies*:

- Technical browsing or session *cookies*, used to manage normal browsing and user authentication;
- Functional technical *cookies*, used to store customisation of the user's choices, such as language;
- Technical analytics *cookies*, used to determine how users use our website, so that we can assess and improve its functioning, solely for optimisation purposes, for example collecting overall information on the number of users who visit the site and/or which pages are most visited.

In accordance with the provisions of the relevant regulations in force, the installation of technical *cookies* does not require users' consent. Similarly, technical analytics *cookies* are installed by Dotweb and are provided exclusively for the collection of information in aggregate form on the number of users and how they visit the site.

#### **Third-party, analytics and profiling *cookies***

Third-party *cookies* may be installed: these are the analytics and profiling *cookies* indicated in the following table. These *cookies* are sent from the internet sites of aforementioned third parties outside our own site.

Third-party analytics *cookies* are used to gather information on user behavior on the site. Identification is done anonymously to monitor services and improve the site's usability. Third-party profiling *cookies* are used to create user profiles, in order to produce advertising messages in line with the choices made by said users.

Furthermore, where interaction services with social networks are used by the user (for example the so-called "social widgets" indicated in the following table), directly from the pages of the website of the owner, the *cookies* installed by these services can collect and transmit data to third parties based in countries where the GDPR is not applied (countries outside the EU - USA), for which, in any case, an adequacy provision is in force on the level of data protection by the European Commission.

The use of these *cookies* and the corresponding disabling option are governed by rules drawn up by the third parties; therefore the Data Subject is invited to consult the policies on the processing of personal data, and the instructions for managing or disabling *cookies*, which are published on the web pages shown below. The said policies may be provided in a language other than that of the Data

Subject, in any case the latter may contact Dotweb, using the reference details provided in Section I, to obtain information and/or clarification thereon in the language of said Data Subject:

MANAGER	COOKIES	DATA COLLECTED	MANAGER PRIVACY LINK	LINK INCLUDED IN THE CODE	LINK TO DISABLE COOKIES
Google	_ga	Records a unique ID used to generate statistics on how the visitor uses the website. Records IP and demographics, where possible, to display user-targeted advertisements and TransactionID for orders placed (not all on all sites).	<a href="https://www.google.com/intl/en/policies/privacy/">https://www.google.com/intl/en/policies/privacy/</a>	<ul style="list-style-type: none"> <li>• Login</li> <li>• Registration</li> <li>• "Share" button</li> <li>• Video Embed</li> <li>• Maps Embed</li> <li>• Link to Social</li> </ul>	<a href="https://support.google.com/accounts/answer/61416?hl=en">https://support.google.com/accounts/answer/61416?hl=en</a>
	_gid	Records a unique ID used to generate statistics on how the visitor uses the website.			
	VisitorStatus	Used to collect statistical data on user-defined parameters in Google Analytics.			
	ads/ga-audiences	Pixel			
	IDE, id, APISID, HSID, NID, SAPISID, SID, SIDCC, SSID	Used by Google DoubleClick to record and produce reports on user action on the site after displaying or clicking on one of the ads produced by the advertiser, in order to measure the effectiveness of the advertising and to present the user with targeted advertising.			
Youtube	PREF	Records a unique ID used by Google for statistics on how the visitor to the site uses YouTube videos on different internet sites.	<a href="https://www.youtube.com/intl/en-US/about/policies/#community-guidelines">https://www.youtube.com/intl/en-US/about/policies/#community-guidelines</a>	<ul style="list-style-type: none"> <li>• Login</li> <li>• Registration</li> <li>• "Share" button</li> <li>• Video Embed</li> <li>• Link to Social</li> </ul>	<a href="https://support.google.com/accounts/answer/61416?hl=en">https://support.google.com/accounts/answer/61416?hl=en</a>
	GPS	Records a unique ID on mobile devices to facilitate tracking on the basis of GPS geographical positioning.			
	VISITOR_INFO1_LIVE	Used for tracking preferences and performance related to YouTube embedded video (Embedded).			
	YSC	Records a unique ID for statistics on what YouTube videos have been watched by the user.			
Facebook	Fr, fbp	Used by Facebook to provide a series of advertising products such as real time offers from third-party advertisers.	<a href="https://www.facebook.com/privacy/explanation">https://www.facebook.com/privacy/explanation</a>	facebook.com - fr	<a href="https://www.facebook.com/help/cookies/">https://www.facebook.com/help/cookies/</a>

MANAGER	COOKIES	DATA COLLECTED	MANAGER PRIVACY LINK	LINK INCLUDED IN THE CODE	LINK TO DISABLE COOKIES
	act, c_user, csm, datr, presence, sb, spin, wd, xs	It allows you to be linked to your Facebook account and enables social media features within the site.		<ul style="list-style-type: none"> <li>• Login</li> <li>• Registration</li> <li>• "Share" button</li> <li>• Video Embed</li> <li>• Link to Social</li> </ul>	
Twitter	gt, guest_id, personalization_id, _ga, _gid, _twitter_sess, ads_prefs, auth_token, csrf_same_site, csrf_same_site_set, ct0, dnt, eu_cn, kdt, lang, remember_checked_on, twid	It allows you to be linked to your Twitter account and enables social media features within the site.	<a href="https://twitter.com/en/privacy">https://twitter.com/en/privacy</a>	<ul style="list-style-type: none"> <li>• Login</li> <li>• Registration</li> <li>• "Share" button</li> <li>• Video Embed</li> <li>• Link to Social</li> </ul>	<a href="https://help.twitter.com/en/rules-and-policies/twitter-cookies">https://help.twitter.com/en/rules-and-policies/twitter-cookies</a>
Instagram	CsrfToken, ds_user_id, ig_cb, mid, rur, sessionid, shbid, shbts, urlgen	It allows you to be linked to your Instagram account and enables social media features within the site.	<a href="https://help.instagram.com/519522125107875">https://help.instagram.com/519522125107875</a>	<ul style="list-style-type: none"> <li>• Login</li> <li>• Registration</li> <li>• "Share" button</li> <li>• Video Embed</li> <li>• Link to Social</li> </ul>	<a href="https://help.instagram.com/1896641480634370">https://help.instagram.com/1896641480634370</a>
Vimeo	vuid, player	Vimeo's integrable video player uses cookies that are considered essential to the video player experience.	<a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>	Video Embed	<a href="https://vimeo.com/cookie-policy">https://vimeo.com/cookie-policy</a>

**SECTION III**

**Communication to third parties and categories of recipients (Article 13, paragraph 1 GDPR)**

The Data Subject's personal data is primarily communicated to third parties and/or recipients whose activity is necessary for carrying out operations involved in the processing of data and for meeting certain legal requirements, such as:

Categories of recipients	
Companies belonging to the Aruba S.p.A. Group ("Aruba Group")	Third party providers and companies belonging to the Aruba S.p.A. Group*
Judicial Authorities, Monitoring and Inspection Authorities	Formally mandated subjects or those with recognized legal rights

\* The Controller requires its own third party providers and Data Processors to adhere to security measures that are equal to those adopted for you by restricting the Data Processor's scope of action to processing directly related to the requested service.

## SECTION IV

### How we process your data (Article 32, GDPR)

The Controller makes use of appropriate security measures to preserve the confidentiality, integrity and availability of your personal data, and requires the same security measures from third party providers and the Processors.

### Where we process your data

Your data is stored in hard copy, electronic and remote archives located in countries where the GDPR is applicable (EU countries) and may be communicated to third parties based in countries where GDPR is not applied (non-EU countries), (U.S.), for which in any case there is an adequacy provision on the level of data protection by the European Commission.

### How long is your data stored? (Article 13, paragraph 2 (a) GDPR)

The length of time for which the information gathered via *cookies* is stored depends on the type of cookies involved:

- Technical *cookies*: Dotweb does not store data relating to technical *cookies* because this is stored in the user's terminal equipment. The Data Subject may at any time delete this type of *cookie* by means of the processes described in this policy;
- Profiling *cookies*: profiling data is not stored, but its management must be carried out by the user directly with the third parties, depending on the instructions received from them and by means of the instruments specified in this policy.

### What are your rights? (Articles 15 – 20 GDPR)

You have the right to obtain the following from the Data Controller:

a) confirmation on whether your personal data is being processed and if so, to obtain access to your personal data and the following information:

1. the purposes of the processing;
2. the categories of personal data in question;
3. the recipients or categories of recipients that have received or will receive your personal data, in particular if these recipients are in third party countries or are international organizations;
4. when possible, the anticipated storage period of your personal data or, if not possible, the criteria used to determine this period;
5. whether you have the right to ask the Data Controller to correct or delete your personal data or the limits on processing your personal data or to oppose the processing of the data;
6. the right to file a claim with a supervisory authority;
7. in the event the data is not collected from you, all of the information available regarding its source;
8. whether there is an automated decision process, including profiling, and, at least in these cases, significant information on the logic used, as well as the importance and consequences to you for this processing;
9. the suitable guarantees provided by the third party country (outside EU) or international organization to protect any transferred data.

b) the right to obtain a copy of the personal data processed, again given that this right does not affect the rights and freedoms of others; for extra copies requested by you, the Data Controller may assign a reasonable fee based on administrative costs;

c) the right to edit any of your incorrect personal data from the Data Controller without unjustified delay;

d) the right to have the data processor delete the personal data relating to the Data Subject without undue delay, if the grounds contemplated in art. 17 of the GDPR apply, which includes situations in which the data is no longer necessary for processing purposes, or if this is seen as unlawful, and provided the legal conditions for this apply; and in any case if processing of the data is not justified for any other similarly legitimate purpose;

e) the right to obtain limits on the processing from the Data Controller, in those cases outlined in Art. 18 of the GDPR, for example where you have disputed the correctness, for the period necessary for the Data Controller to verify the data's accuracy. You must be

notified, within an appropriate time, even when the suspension period has passed or the cause of limiting the processing has been eliminated, and therefore the limitation itself has been withdrawn;

f) the right to obtain information from the Data Controller on the recipients who have received the requests for any corrections or deletions or limits on the processing implemented, except when this is impossible or would create a disproportionate effort;

g) the right to receive your personal data in a structured format, commonly used and readable by automatic devices as well as the right to forward this data to another Data Controller without obstruction from the original Data Controller, in those cases outlined by Art. 20 of the GDPR, and the right to obtain direct forwarding of your personal data from one Data Controller to another, if technically feasible.

To obtain further information and to submit your request, you must contact the Data Controller at [privacy@staff.aruba.it](mailto:privacy@staff.aruba.it). To guarantee that the above rights are exercised by the Data Subject and not by unauthorised third parties, the Data Controller may ask the former to provide further information necessary for this purpose.

#### **How and when can you oppose the processing of your personal data? (Art. 21 GDPR)**

For reasons connected with the Data Subject's particular circumstances, the latter may at any time refuse the processing of its personal data if this is justified on legitimate grounds or if it is carried out for commercial promotion purposes, by sending its request to the Data Controller at [privacy@staff.aruba.it](mailto:privacy@staff.aruba.it).

You have the right to have your own personal data deleted if the Data Controller has no legitimate reason prevailing over such request, and in any case, where you have opposed the processing for business promotional activities.

#### **Who can you file a claim with? (Art. 15 GDPR)**

Recognising the possibility of any other administrative or judicial action, the Data Subject may lodge a complaint with the competent monitoring authority in Italy (the Italian Data Protection Authority) or to the agency that performs this role and exercises the corresponding powers in the Member State in which violation of the GDPR has occurred.

Any updates to this information shall be communicated in a timely manner and through suitable means, and will be notified to you if the Data Controller processes your data for purposes other than those outlined in this notice prior to proceeding and after you have given your consent, if necessary.

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