# **Cookie Policy of Mitigant**

To find more information on California consumers and their privacy rights, Users may read the privacy policy.

To find more information on Virginia consumers and their privacy rights, Users may read the privacy policy.

To find more information on Colorado consumers and their privacy rights, Users may read the privacy policy.

To find more information on Connecticut consumers and their privacy rights, Users may read the privacy policy.

To find more information on Utah consumers and their privacy rights, Users may read the privacy policy.

This document informs Users about the technologies that help Mitigant to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with Mitigant.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Mitigant uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

# Activities strictly necessary for the operation of Mitigant and delivery of the Service

Mitigant uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

# **First-party Trackers**

- redux-persist localStorage test: indefinite
- persist:root: indefinite
- \_\_\_\_\_cf\_\_bm: 30 minutes
- test: indefinite
- rc::a: indefinite
- rc::c: duration of the session
- rc::d-1654052368125: indefinite
- rc::b: duration of the session
- rc::d-1654052368626: indefinite
- rc::d-1654052368626-d85cbe4b: indefinite
- gapi.sessionStorageTest: duration of the session
- \_GRECAPTCHA: 6 months
- \_\_\_\_hstc: 6 months
- \_\_\_\_\_hssrc: duration of the session
- \_\_\_\_hssc: 30 minutes
- \_ga: 2 years
- \_gid: 1 day
- \_gat\_gtag\_UA\_167441722\_1: 1 minute
- messagesUtk: 6 months
- hubspotutk: 6 months
- \_dd\_s: 15 minutes
- usprivacy: 1 year

# **Third-party Trackers**

# **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on Mitigant in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

#### **Google Tag Manager (Google Ireland Limited)**

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland - Privacy Policy.

# Other activities involving the use of Trackers

# **Functionality**

Mitigant uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

#### User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Mitigant, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving Mitigant.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Mitigant.

#### HubSpot CRM (HubSpot, Inc.)

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data processed: company name, country, email address, first name, last name, phone number, profession, Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

Legal basis for processing: Consent.

Place of processing: United States – Privacy Policy.

Storage duration:

- \_\_hs\_gpc\_banner\_dismiss: 6 months
- \_\_hssc: 30 minutes
- \_\_\_\_hssrc: duration of the session
- \_\_hstc: 2 months
- hubspotutk: 2 months
- messagesUtk: 2 months

#### HubSpot Lead Management (HubSpot, Inc.)

HubSpot Lead Management is a User database management service provided by HubSpot, Inc.

Personal Data processed: city, company name, country, email address, first name, last name, profession, purchase history, Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

- \_\_hs\_gpc\_banner\_dismiss: 6 months
- \_\_\_\_\_hssc: 30 minutes
- \_\_hssrc: duration of the session
- \_\_\_\_\_hstc: 2 months
- hubspotutk: 2 months

• messagesUtk: 2 months

#### SendinBlue Marketing Automation (SendinBlue SAS)

SendinBlue is a User database management service provided by SendinBlue SAS.

Personal Data processed: email address, Trackers and Usage Data.

Place of processing: France - Privacy Policy.

Storage duration:

• sib\_cuid: 7 months

# Experience

Mitigant uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

#### Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of Mitigant and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### **Google Fonts (Google Ireland Limited)**

Google Fonts is a typeface visualization service provided by Google Ireland Limited that allows Mitigant to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – Privacy Policy.

#### YouTube video widget (Google Ireland Limited)

YouTube is a video content visualization service provided by Google Ireland Limited that allows Mitigant to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – Privacy Policy.

Storage duration:

- PREF: 8 months
- VISITOR\_INFO1\_LIVE: 8 months
- YSC: duration of the session

#### Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of Mitigant. The interaction and information obtained through Mitigant are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on Mitigant isn't being connected back to the User's profile.

#### LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy.

#### Storage duration:

- AnalyticsSyncHistory: 1 month
- JSESSIONID: duration of the session
- UserMatchHistory: 1 month
- bcookie: 1 year
- bscookie: 1 year
- lang: duration of the session
- lidc: 1 day
- lissc: 1 year
- lms\_ads: 1 month
- lms\_analytics: 1 month

# Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

• personalization\_id: 2 years

# Measurement

Mitigant uses Trackers to measure traffic and analyze User behavior to improve the Service.

# 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.

# HubSpot Analytics (HubSpot, Inc.)

HubSpot Analytics is an analytics service provided by HubSpot, Inc.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Consent.

Place of processing: United States - <u>Privacy Policy</u> - <u>Opt Out</u>.

Storage duration:

- \_\_hs\_gpc\_banner\_dismiss: 6 months
- \_\_\_\_\_hssc: 30 minutes
- \_\_\_\_\_hssrc: duration of the session
- \_\_\_\_\_hstc: 2 years
- hubspotutk: 2 years
- messagesUtk: 2 years

# Analytics services managed directly by Mitigant

The services contained in this section allow the Owner to collect and manage analytics through the use of first-party Trackers.

# Matomo (Mitigant)

Matomo is an analytics software used by Mitigant to analyze data directly without the help of third parties.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Consent.

- pk cvar\*: 30 minutes
- \_pk\_id\*: 2 years
- \_pk\_ref\*: 7 months
- \_pk\_ses\*: 30 minutes
- \_pk\_testcookie\*: duration of the session

# Anonymized analytics services

The services contained in this section allow the Owner, through the use of third-party Trackers, to collect and manage analytics in an anonymized form.

#### Google Analytics with anonymized IP (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of Mitigant, 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. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

- AMP TOKEN: 1 hour
- \_ga: 2 years
- \_gac\*: 3 months
- \_gat: 1 minute
  \_gid: 1 day

# Marketing

Mitigant uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads.

# Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Mitigant, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e.

displaying ads tailored to the User's interests and behavior, including those detected outside Mitigant. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### LinkedIn Ads (LinkedIn Ireland Unlimited Company)

LinkedIn Ads is an advertising service provided by LinkedIn Ireland Unlimited Company.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – Privacy Policy – Opt out.

- GAID: indefinite
- IDFA: indefinite
- UserMatchHistory: 1 month
- \_gcl\_\*: 3 months
- guid: 3 months
- aam uuid: 1 month
- li fat id: 1 month
- li giant: 7 days
- li sugr: 3 months

- lms\_ads: 1 month
- oribi\_cookie\_test: duration of the session
- oribi\_session: 2 hours
- oribi\_user\_guid: 7 months

#### LinkedIn conversion tracking (LinkedIn Insight Tag) (LinkedIn Corporation)

LinkedIn conversion tracking (LinkedIn Insight Tag) is an analytics and behavioral targeting service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on Mitigant. The LinkedIn Insight Tag tracks conversions that can be attributed to LinkedIn ads and enables to target groups of Users on the base of their past use of Mitigant.

Users may opt out of behavioral targeting features through their device settings, <u>their LinkedIn account settings</u> or by visiting the <u>AdChoices opt-out page</u>.

Personal Data processed: device information, Trackers and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

- AnalyticsSyncHistory: 1 month
- JSESSIONID: duration of the session
- UserMatchHistory: 1 month
- bcookie: 1 year
- bscookie: 1 year
- lang: duration of the session
- lidc: 1 day
- lms\_ads: 1 month
- lms\_analytics: 1 month

#### Google Ads conversion tracking (Google Ireland Limited)

Google Ads conversion tracking is an analytics service provided by Google Ireland Limited that connects data from the Google Ads advertising network with actions performed on Mitigant.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – Privacy Policy.

Storage duration:

- IDE: 2 years
- test\_cookie: 15 minutes

# Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

#### SendinBlue Email (SendinBlue SAS)

SendinBlue is an email address management and message sending service provided by SendinBlue SAS.

Personal Data processed: email address, Trackers and Usage Data.

Place of processing: France - Privacy Policy.

# How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

#### **Locating Tracker Settings**

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- <u>Google Chrome</u>
- Mozilla Firefox
- <u>Apple Safari</u>
- <u>Microsoft Internet Explorer</u>
- Microsoft Edge
- <u>Brave</u>
- <u>Opera</u>

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

# How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by <u>YourOnlineChoices</u> (EU and UK), the <u>Network</u> <u>Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

#### Consequences of denying the use of Trackers

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help Mitigant to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

# **Owner and Data Controller**

Mitigant GmbH August-Bebel-Straße 28 14482 Potsdam, Brandenburg Germany

#### Owner contact email: contact@mitigant.io

Since the use of third-party Trackers through Mitigant cannot be fully controlled by the Owner, any specific references to thirdparty Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by Mitigant.

# **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 Mitigant (or third-party services employed in Mitigant), which can include: the IP addresses or domain names of the computers utilized by the Users who use Mitigant, 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 Mitigant 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 Mitigant. The Data Controller, unless otherwise specified, is the Owner of Mitigant.

#### Mitigant (or this Application)

The means by which the Personal Data of the User is collected and processed.

#### Service

The service provided by Mitigant 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 privacy statement has been prepared based on provisions of multiple legislations.

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

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