# Cookie Policy of Powersoft S.p.A.

This document informs Users about the technologies that help Powersoft S.p.A. 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 Powersoft S.p.A.

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Powersoft S.p.A. 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 Powersoft S.p.A. and delivery of the Service

Powersoft S.p.A. 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.

#### **Third-party Trackers**

# Tag Management

This type of service helps the Owner to manage the tags or scripts needed on Powersoft S.p.A. 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

# **Experience**

Powersoft S.p.A. 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 Powersoft S.p.A. 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 Powersoft S.p.A. to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – Privacy Policy.

#### Google Maps widget (Google Ireland Limited)

Google Maps is a maps visualization service provided by Google Ireland Limited that allows Powersoft S.p.A. to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – Privacy Policy.

#### 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 Powersoft S.p.A.

The interaction and information obtained through Powersoft S.p.A. 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 Powersoft S.p.A. isn't being connected back to the User's profile.

# Facebook Like button and social widgets (Meta Platforms Ireland Limited)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms Ireland Limited

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

• fbp: 3 months

#### Measurement

Powersoft S.p.A. 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.

#### **Google Analytics 4 (Google Ireland Limited)**

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 Powersoft S.p.A, 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. Users can learn more by consulting Google's official documentation.

Personal Data processed: browser information, city, device information, latitude (of city), longitude (of city), number of Users, session statistics and Trackers.

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

Storage duration:

- \_ga: 2 years
- \_ga\_\*: 2 years

# Managing data collection and online surveys

This type of service allows Powersoft S.p.A. to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

#### Data provided via online forms, managed directly (Powersoft S.p.A.)

Powersoft S.p.A. makes use of online forms that can be used to collect Data about Users.

Personal Data processed: answers to questions, city, contact info, country, email address, first name, language, last name, name, profession, Trackers, Usage Data and user content.

# **Marketing**

Powersoft S.p.A. 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 Powersoft S.p.A, 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 Powersoft S.p.A. 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.

#### Salesforce (Salesforce.com, Inc.)

Salesforce is an advertising service provided by Salesforce.com, Inc.

Personal Data processed: Trackers and Usage Data.

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

# 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 Powersoft S.p.A, 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 Powersoft S.p.A.

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

#### Pardot (Salesforce.com, Inc.)

Pardot is a User database management service provided by Salesforce.com, Inc. Pardot may use Trackers to recognize and track Users behavior, as well as, to help deliver personalized ads and content. Users may opt out of Pardot's use of Trackers for advertising purposes by visiting the <u>Salesforce Audience Studio Opt-Out page</u> or following the instructions provided by <u>YourOnlineChoices</u> and <u>AdChoices</u>.

Personal Data processed: Data communicated while using the service, device information, email address, Trackers and Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>.

# Activities that do not fit the above categorizations

#### Pendo.io, Inc.

Pendo.io is a product analytics and user engagement platform provided by Pendo.io Inc. It enables businesses to track and analyze the usage of their digital products, gain insights into user behavior, and improve the overall user experience. Pendo.io collects data to understand how users interact with the digital products and services offered by Powersoft S.p.A. This data is used to generate reports and provide valuable insights to Powersoft S.p.A. It helps them to make data-driven decisions, optimize their product offerings, and enhance user satisfaction.

Additionally, Pendo io may utilize the collected data to personalize and contextualize advertisements within its own advertising

network. This allows Powersoft S.p.A. to tailor ads and promotions based on user's preferences and behavior.

For more detailed information about Pendo.io's data handling practices and privacy policies, refer to these pages:

Privacy Policy/

Terms of Use/

**RETENTION:** 

By default, Pendo retains Personal Data about you for 7 years as long as you have an open account with them or as otherwise necessary to provide you with our Services. In some cases they retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule, or regulation. They may further retain information in an anonymous or aggregated form where that information would not identify you personally.

**Data Retention Policy** 

Storage duration: up to 7 years

# 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:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

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 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 Powersoft S.p.A. 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**

Powersoft SpA, Via Enrico Conti n.5 - 50188 Scandicci (FI), Italy

Owner contact email: privacy@powersoft.com

Since the use of third-party Trackers through Powersoft S.p.A. cannot be fully controlled by the Owner, any specific references to third-party 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 Powersoft S.p.A.

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

# Powersoft S.p.A. (or this Application)

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

#### Service

The service provided by Powersoft S.p.A. 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 policy relates solely to Powersoft S.p.A, if not stated otherwise within this document.

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