# Cookie Policy of www.cortinabikeland.com

This document informs Users about the technologies that help this Application 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 this Application.

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Application 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.

# **How this Application uses Trackers**

# **Necessary**

This Application 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.

# Trackers managed directly by the Owner

# **Direct registration (this Application)**

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data processed: email address, first name, last name, phone number and Trackers.

#### **Preference Cookies (this Application)**

Preference Cookies store the User preferences detected on this Application in the local domain such as, for example, their timezone and region.

Personal Data processed: Trackers.

# Trackers managed by third parties

#### Wix (Wix.com, Ltd.)

Wix is a platform provided by Wix.com, Ltd. that allows the Owner to build, run and host this Application. Wix is highly customizable and can host websites from simple blogs to complex e-commerce platforms.

Personal Data processed: email address, first name, last name, phone number, Trackers and Usage Data.

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

# Trackers duration:

- TS\*: indefinite
- XSRF-TOKEN: duration of the session
- \_wixAB3|\*: 7 months
- \_wixCIDX: 3 months
- \_wix\_browser\_sess: duration of the session
- bSession: 30 minutes

- client-session-bind: indefinite
- fedops.logger.defaultOverrides: 2 years
- fedops.logger.sessionId: duration of the session
- hs: duration of the sessionserver-session-bind: indefinite
- ssr-caching: duration of the session
- svSession: 1 year

### iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information, and in particular to the use of Cookies and other Trackers on this Application.

Personal Data processed: IP address and Trackers.

Place of processing: Italy – Privacy Policy.

Trackers duration:

• \_iub\_cs-\*: 1 year

#### Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers and Usage Data.

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

# **Functionality**

This Application 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.

# Trackers managed by third parties

# Facebook Authentication (Meta Platforms, Inc.)

Facebook Authentication is a registration and authentication service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Trackers and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Trackers duration:

- \_fbp: 3 months
- datr: 2 years
- fbssls\_\*: duration of the session
- lastExternalReferrer: duration of the session

# **Experience**

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

# Trackers managed by third parties

# Facebook account access (Meta Platforms, Inc.)

This service allows this Application to connect with the User's account on the Facebook social network, provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing.

Permissions asked: News Feed and Wall, Trackers, Usage Data and User Timeline Posts Access.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Trackers duration:

• fbp: 3 months

• lastExternalReferrer: duration of the session

#### Facebook Like button and social widgets (Meta Platforms, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers and Usage Data.

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

Trackers duration:

\_fbp: 3 monthsdatr: 2 years

• lastExternalReferrer: duration of the session

### OpenStreetMap widget (OpenStreetMap Foundation )

OpenStreetMap widget is a maps visualization service provided by OpenStreetMap Foundation that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United Kingdom – Privacy Policy.

### Instagram widget (Meta Platforms, Inc.)

Instagram is an image visualization service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

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

# Google Maps widget (Google LLC)

Google Maps is a maps visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

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

# Facebook Comments (Meta Platforms, Inc.)

Facebook Comments is a content commenting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Trackers duration:

• datr: 2 years

• lastExternalReferrer: duration of the session

### Measurement

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

# Trackers managed by third parties

# Google Analytics (Universal Analytics) (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of this Application, 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 order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers and Usage Data.

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

Trackers duration:

• AMP\_TOKEN: 1 hour

\_ga: 2 years \_gac\*: 3 months \_gat: 1 minute gid: 1 day

# Google Analytics Advertising Reporting Features (Google LLC)

Google Analytics on this Application has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

In order to understand Google's use of Data, consult **Google's partner policy**.

Personal Data processed: Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and various types of Data as specified in the privacy policy of the service.

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

Trackers duration:

IDE: 2 years\_gcl\_\*: 3 monthstest\_cookie: 15 minutes

# User ID extension for Google Analytics (Google LLC)

Google Analytics on this Application makes use of a feature called User ID. This setup allows for a more accurate tracking of Users by associating that User with the same ID over various sessions and devices. It is set up in a way that doesn't allow Google to personally identify an individual or permanently identify a particular device.

The User ID extension might make it possible to connect Data from Google Analytics with other Data about the User collected by this Application.

The opt-out link below will only opt you out for the device you are on, but not from tracking performed independently by the Owner. Contact the Owner via the email address provided in this privacy policy to object to the aforementioned tracking as well.

Personal Data processed: Trackers.

Place of processing: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy – Opt Out.

# Google Analytics Demographics and Interests reports (Google LLC)

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for this Application (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Trackers and unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

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

Trackers duration:

IDE: 2 years\_gcl\_\*: 3 months

• test\_cookie: 15 minutes

# Google Play Beta Testing (Google LLC)

Google Play Beta Testing is a beta testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers.

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

# **Marketing**

This Application uses Trackers to deliver personalized ads or marketing content, and to measure their performance.

### Trackers managed by third parties

# Google Ad Manager (Google LLC)

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with. This service uses the "DoubleClick" Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

### Trackers duration:

- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- GCL\_AW\_P: 3 months
- GED\_PLAYLIST\_ACTIVITY: duration of the session
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- \_\_gads: 2 years
- \_\_gpi: 2 years
- \_\_gpi\_optout: 2 years
- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_ag: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months

\_gcl\_gs: 3 months \_gcl\_ha: 3 months

ar\_debug: 3 months id: 2 years

• receive-cookie-deprecation: 6 months

• test\_cookie: 15 minutes

# Google AdSense (Google LLC)

Google AdSense is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. This service uses the "DoubleClick" Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers and Usage Data.

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

#### Trackers duration:

• Conversion: 3 months

• DSID: 14 days

• FCNEC: 1 year

• FLC: 10 seconds

• FPAU: 3 months

• FPGCLAW: 3 months

• FPGCLDC: 3 months

• FPGCLGB: 3 months

• GCL\_AW\_P: 3 months

• GED\_PLAYLIST\_ACTIVITY: duration of the session

• IDE: 2 years

• NID: 6 months

• RUL: 1 year

• \_\_gads: 2 years

• \_\_gpi: 2 years

• \_\_gpi\_optout: 2 years

• \_\_gsas: 2 years

• \_gac\_: 3 months

• \_gac\_gb\_: 3 months

• \_gcl\_ag: 3 months

• \_gcl\_au: 3 months

• \_gcl\_aw: 3 months

• \_gcl\_dc: 3 months

\_gcl\_gb: 3 months

• \_gcl\_gf: 3 months

\_gcl\_gs: 3 months

• \_gcl\_ha: 3 months

• ar\_debug: 3 months

• id: 2 years

• receive-cookie-deprecation: 6 months

• test\_cookie: 15 minutes

# Google Campaign Manager 360 (Google LLC)

Google Campaign Manager 360 is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with. Google Campaign Manager 360 also allows the Owner to measure the campaign's performance, to set up placements, ads, and creatives, and to verify tag implementations (such as errors in the ad's formatting). This Application is collecting and transmitting Data from the User through Google Campaign Manager 360 to media buyers bidding to purchase its inventory. These buyers may collect and store such Data and use such Data for retargeting or other advertising purposes.

Users may decide to disable all the ad personalization Trackers by going to: <u>Google Ad Settings</u>.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: geographic position, Trackers and Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

### Trackers duration:

• Conversion: 3 months

• DSID: 14 days

• FCNEC: 1 year

• FLC: 10 seconds

• FPAU: 3 months

• FPGCLAW: 3 months

• FPGCLDC: 3 months

• FPGCLGB: 3 months

• GCL\_AW\_P: 3 months

• GED\_PLAYLIST\_ACTIVITY: duration of the session

• IDE: 2 years

• NID: 6 months

• RUL: 1 year

• \_\_gads: 2 years

\_\_gpi: 2 years

• \_\_gpi\_optout: 2 years

• \_\_gsas: 2 years

• \_gac\_: 3 months

• \_gac\_gb\_: 3 months

• \_gcl\_ag: 3 months

• \_gcl\_au: 3 months

• gcl aw: 3 months

• \_gcl\_dc: 3 months

\_gcl\_gb: 3 months

• \_gcl\_gf: 3 months

\_gcl\_gs: 3 months

• \_gcl\_ha: 3 months

• ar\_debug: 3 months

• id: 2 years

• receive-cookie-deprecation: 6 months

• test\_cookie: 15 minutes

# Google Ads conversion tracking (Google LLC)

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on this Application.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers and Usage Data.

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

### Trackers duration:

• IDE: 2 years

• test\_cookie: 15 minutes

# Google Ads Similar audiences (Google LLC)

Similar audiences is an advertising and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of this Application. On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google <u>Ad Settings</u>.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy – Opt Out.

### Trackers duration:

- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- GCL AW P: 3 months
- GED\_PLAYLIST\_ACTIVITY: duration of the session
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- \_\_gads: 2 years
- \_\_gpi: 2 years
- \_\_gpi\_optout: 2 years
- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_ag: 3 months
- \_gcl\_au: 3 months
- gcl aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- \_gcl\_gs: 3 months
- \_gcl\_ha: 3 months
- ar\_debug: 3 months
- id: 2 years
- receive-cookie-deprecation: 6 months
- test\_cookie: 15 minutes

# Google Ad Manager Audience Extension (Google LLC)

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that tracks the visitors of this Application and allows selected advertising partners to display targeted ads across the web to them.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers and Usage Data.

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

### Trackers duration:

- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- GCL\_AW\_P: 3 months
- GED\_PLAYLIST\_ACTIVITY: duration of the session
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- \_\_gads: 2 years
- \_\_gpi: 2 years
- \_\_gpi\_optout: 2 years
- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months

- \_gcl\_ag: 3 months
- gcl au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- \_gcl\_gs: 3 months
- \_gcl\_ha: 3 months
- ar\_debug: 3 months
- id: 2 years
- receive-cookie-deprecation: 6 months
- test\_cookie: 15 minutes

### Google Ads Remarketing (Google LLC)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

In order to understand Google's use of Data, consult Google's partner policy.

Users can opt out of Google's use of Trackers for ads personalization by visiting Google's Ads Settings.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy – Opt Out.

### Trackers duration:

- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- GCL AW P: 3 months
- GED PLAYLIST ACTIVITY: duration of the session
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- \_\_gads: 2 years
- \_\_gpi: 2 years
- \_\_gpi\_optout: 2 years
- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_ag: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- \_gcl\_gs: 3 months
- \_gcl\_ha: 3 months
- ar\_debug: 3 months
- id: 2 years
- receive-cookie-deprecation: 6 months
- test\_cookie: 15 minutes

### Remarketing with Google Analytics (Google LLC)

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the tracking activity performed by Google Analytics and its Trackers with the Google Ads advertising network and the Doubleclick Cookie.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers and Usage Data.

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

Trackers duration:

• test cookie: 15 minutes

IDE: 2 years\_gcl\_\*: 3 months

# How to manage preferences and provide or withdraw consent on this Application

Whenever the use of Trackers is based on consent, users can provide or withdraw such consent by setting or updating their preferences via the relevant privacy choices panel available on this Application.

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.

### How to control or delete Cookies and similar technologies via your device settings

Users may use their own browser settings to:

- See what Cookies or other similar technologies have been set on the device;
- Block Cookies or similar technologies;
- Clear Cookies or similar technologies from the browser.

The browser settings, however, do not allow granular control of consent by category.

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 <a href="YourOnlineChoices">YourOnlineChoices</a> (EU and UK), the <a href="Network Advertising Initiative">Network Advertising Initiative</a> (US) and the <a href="Digital Advertising Alliance">Digital Advertising Alliance</a> (US), <a href="DAAC">DAAC</a> (Canada), <a href="DDAI">DDAI</a> (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 this Application 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**

Dolomiti Bike Company Srl Via Rinaldo Menardi 5 32043 Cortina d'Ampezzo (BL) C.F. - P.I. IT01228990253 +39 342 173 5493

Owner contact email: info@cortinabikeland.com

Since the use of third-party Trackers through this Application 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 this Application.

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

# **This Application**

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

### Service

The service provided by this Application 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.

# Compose

Create, read, update, and delete drafts. Send messages and drafts.

# Legal information

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

Latest update: May 09, 2024