

# Cookie Policy of [www.elsasrl.com](http://www.elsasrl.com)

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

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.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

To find more information dedicated to Californian consumers and their privacy rights, Users may [read the privacy policy](#).

## Activities strictly necessary for the operation of this Website and delivery of the Service

This Website 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

Storage duration:

- UserMatchHistory: duration of the session
- lang: duration of the session
- li\_gc: duration of the session
- LOCALIZE\_DEFAULT\_LANGUAGE: indefinite

### Third-party Trackers

## Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Website 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 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.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

## Other activities involving the use of Trackers

### Measurement

This Website uses Trackers to measure traffic and analyze User behavior with the goal of improving 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**

Google 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 Website, 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.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#); Ireland - [Privacy Policy](#) - [Opt Out](#).

Storage duration:

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

### **Google Ads conversion tracking**

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 Website.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - [Privacy Policy](#); Ireland - [Privacy Policy](#).

Storage duration:

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

### **Twitter Ads conversion tracking (Twitter, Inc.)**

Twitter Ads conversion tracking is an analytics service provided by Twitter, Inc. that connects data from the Twitter advertising network with actions performed on this Website.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - [Privacy Policy](#).

Storage duration:

- personalization\_id: 2 years

### **Facebook Ads conversion tracking (Facebook pixel)**

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Meta advertising network with actions performed on this Website. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - [Privacy Policy](#); Ireland - [Privacy Policy](#).

Storage duration:

- \_fbp: 3 months

- fr: 3 months

## **Content performance and features testing (A/B testing)**

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of this Website.

### **Google Optimize**

Google Optimize is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Storage duration:

- \_gaexp: 3 months
- \_opt\_awcid: 1 day
- \_opt\_awgid: 1 day
- \_opt\_awkid: 1 day
- \_opt\_awmid: 1 day
- \_opt\_expid: 10 seconds
- \_opt\_utmc: 1 day

### **Google Optimize 360**

Google Optimize 360 is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

This service allows the Owner to target groups of Users on the base of their past use of this Website. Users that [opt-out](#) of tracking by Google Analytics will not be included in experiments created in Google Optimize 360.

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Storage duration:

- \_gaexp: 3 months
- \_opt\_awcid: 1 day
- \_opt\_awgid: 1 day
- \_opt\_awkid: 1 day
- \_opt\_awmid: 1 day
- \_opt\_expid: 10 seconds
- \_opt\_utmc: 1 day

## **Targeting & Advertising**

This Website 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 this Website, 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 this Website. 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.

### **Jetpack (Jetpack Digital LLC)**

Jetpack is an advertising service provided by Jetpack Digital LLC.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Storage duration:

- JP:\*: indefinite

### **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](#).

### **Mailchimp (Intuit Inc.)**

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: Trackers.

Place of processing: United States – [Privacy Policy](#).

### **Remarketing and behavioral targeting**

This type of service allows this Website and its partners to inform, optimize and serve advertising based on past use of this Website by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

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 Website Retargeting (LinkedIn Corporation)**

LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of this Website with the LinkedIn advertising network.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- AnalyticsSyncHistory: 1 month
- JSESSIONID: duration of the session
- UserMatchHistory: 1 month
- bcookie: 2 years
- bscookie: 2 years
- lang: duration of the session
- lidc: 1 day
- lissc: 1 year

- lms\_ads: 1 month
- lms\_analytics: 1 month

## 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 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.

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 and withdraw their consent 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 [YourOnlineChoices](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (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 [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

## Consequences of denying consent

Users are free to decide whether or not to grant consent. However, please note that Trackers help this Website to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, in the absence of the User's consent, the Owner may be unable to provide related features.

## Owner and Data Controller

ELSA Srl - Loc. La Petrizia SS 106 , 88050 Sellia Marina, CZ -

**Owner contact email:** [privacy@elsasrl.com](mailto:privacy@elsasrl.com)

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

## **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 Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, 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 Website who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Data Supervisor)**

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 Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

### **This Website (or this Application)**

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

### **Service**

The service provided by this Website 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.

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**Legal information**

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

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

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