Cookie Policy of Incold S.p.A.

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.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

Activities strictly necessary for the operation of this Application and delivery of the Service

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.

Third-party Trackers

Traffic optimisation and distribution

This type of service allows this Application to distribute their content using servers located across different countries and to optimise their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc. The way Cloudflare is integrated means that it filters all the traffic through this Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

Personal Data processed: Trackers.

Place of processing: United States - Privacy Policy.

Spam and bots protection

This type of service analyses the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognised as spam or protecting it from malicious bots activities.

Cloudflare Bot Management (Cloudflare Inc.)

Cloudflare Bot Management is a malicious bot protection and management service provided by Cloudflare Inc.

Personal Data processed: app information, Application opens, browser information, browsing history, city, clicks, country, county, custom events, device information, device logs, geography/region, interaction events, IP address, keypress events, language, latitude (of city), launches, longitude (of city), metro area, motion sensor events, mouse movements, number of

sessions, operating systems, page events, page views, province, scroll position, scroll-to-page interactions, search history, session duration, session statistics, state, touch events, Trackers, Usage Data, video views and ZIP/Postal code.

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

Storage duration:

- _____cf__bm: 3 seconds
- ______cfruid: duration of the session
- cf_ob_info: 3 seconds
- cf_use_ob: 3 seconds
- cfmrk_cic: 3 months

Other activities involving the use of Trackers

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.

Contacting the User

Contact form (this Application)

By filling in the contact form with their Data, the User authorises this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: city, country, county, email address, field of activity, first name, last name, phone number, physical address, profession, state, Trackers, various types of Data, website and ZIP/Postal code.

Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Application, in order to contact and be contacted by this Application's support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

HubSpot Chat (HubSpot, Inc.)

HubSpot Chat is a service for interacting with the HubSpot live chat platform provided by HubSpot, Inc.

Personal Data processed: answers to questions, browsing history, city, clicks, company name, contents of the email or message, country, Data communicated while using the service, device information, email address, fax number, first name, industry, IP address, job title, language, last name, number of sessions, page views, phone number, physical address, prefix, referral URL, search history, session duration, state, time the message was received, Trackers, Usage Data, user content, User ID, website and ZIP/Postal code.

Place of processing: Germany - Privacy Policy.

Storage duration:

- hs-messages-hide-welcome-message: 1 day
- hs-messages-is-open: 30 minutes
- messagesUtk: 7 months

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 this Application, 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 this Application.

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

HubSpot CRM (HubSpot, Inc.)

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

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

Place of processing: Germany - 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

Measurement

This Application uses Trackers to measure traffic and analyse User behaviour to improve the Service.

Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

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 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 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 <u>Google's official documentation</u>.

Personal Data processed: number of Users, session statistics, Trackers and Usage Data.

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

Storage duration:

- _ga: 2 years
- _ga_*: 2 years

HubSpot Analytics (HubSpot, Inc.)

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

Personal Data processed: Trackers and Usage Data.

Place of processing: Germany - Privacy Policy.

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

Matomo Cloud (InnoCraft)

Matomo Cloud is an analytics service provided by InnoCraft.

Personal Data processed: app information, browser information, browsing history, city, clicks, country, county, custom events, device information, device logs, geography/region, interaction events, IP address, keypress events, language, launches, metro area, mouse movements, number of sessions, operating systems, order ID, page events, page views, scroll position, scroll-to-page interactions, search history, session duration, session statistics, state, time zone, Trackers, Usage Data, User ID, video views and ZIP/Postal code.

Place of processing: New Zealand - Privacy Policy.

Storage duration:

- _pk_cvar*: 30 minutes
- _pk_id*: 2 years
- _pk_ref*: 7 months
- _pk_ses*: 30 minutes
- _pk_testcookie: 3 seconds

Anonymised 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 anonymised form.

Google Analytics (Universal Analytics) with anonymised IP (Google Ireland Limited)

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilises 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 contextualise and personalise the ads of its own advertising network.

This integration of Google Analytics anonymises 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

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>
- <u>Microsoft Edge</u>
- <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).

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

INCOLD S.p.A. - con Socio Unico Via Grandi, 1 - 45100 Rovigo, Italy C.F./Reg.Imprese Rovigo IT: 02639550280 P.IVA (VAT#): IT 01166700292

Owner contact email: privacy@incold.it

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 utilised by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised 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.

Current City

Provides access to the User's current location.

Legal information

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

Latest update: 22 January 2024