

# Cookie Policy of rafflesmilano.it

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.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

### Spam and bots protection

This type of service analyzes 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 recognized as spam or protecting it from malicious bots activities.

### Google reCAPTCHA (Google Ireland Limited)

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited. The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

Personal Data processed: answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, Trackers and Usage Data.

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

Storage duration:

- `_GRECAPTCHA`: duration of the session
- `rc::a`: indefinite
- `rc::b`: duration of the session
- `rc::c`: duration of the session

### Other activities involving the use of Trackers

#### Experience

This Application 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 this Application 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.

#### **Font Awesome (Fonticons, Inc. )**

Font Awesome is a typeface visualization service provided by Fonticons, Inc. 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 – [Privacy Policy](#).

## **Measurement**

This Application 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 Analytics 4 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 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: city, number of Users, session statistics and Trackers.

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

Storage duration:

- `_ga`: 2 years
- `_ga_*`: 2 years

## **Marketing**

This Application 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 Application, 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 for identifying Users, behavioral retargeting i.e. displaying ads tailored to the User’s interests and behavior, or to measure ads performance. 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.

#### **Meta ads conversion tracking (Meta pixel) (Meta Platforms Ireland Limited)**

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms Ireland Limited that connects data from the Meta Audience Network with actions performed on this Application. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- `_fbp`: 3 months
- `fr`: 3 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 this Application. 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 this Application.

Users may opt out of behavioral targeting features through their device settings, [their LinkedIn account settings](#) or by visiting the [AdChoices opt-out page](#).

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

#### **TikTok conversion tracking (TikTok Technology Limited)**

TikTok conversion tracking is an analytics and behavioral targeting service provided by TikTok Technology Limited that connects data from the TikTok advertising network with actions performed on this Application. The TikTok pixel tracks conversions that can be attributed to TikTok ads and enables to target groups of Users on the base of their past use of this Application.

Personal Data processed: Trackers.

Place of processing: Ireland – [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:

- [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 and UK), 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 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**

Raffles Education Italy srl - Via Felice Casati, 16 – 20124 – Milano

**Owner contact email:** [info@rafflesmilano.it](mailto:info@rafflesmilano.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 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.

---

### **Legal information**

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

Latest update: March 08, 2024