Cookie Policy of Luminalpark.com

This document informs Users about the technologies that help Luminalpark.com 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 Luminalpark.com.

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Luminalpark.com 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 Luminalpark.com and delivery of the Service

Luminalpark.com 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.

Other activities involving the use of Trackers

Functionality

Luminalpark.com 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.

Interaction with live chat platforms

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

Freshdesk Messaging Widget (Freshworks, Inc.)

The Freshdesk Messaging Widget is a service for interacting with the Freshdesk live chat platform provided by Freshworks, Inc.

Personal Data processed: Data communicated while using the service, email address, Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

• _fw_crm_v: 1 year

Experience

Luminalpark.com 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 Luminalpark.com 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 Luminalpark.com to incorporate content of this kind on its pages.

Personal Data processed: Tracker and Usage Data.

Place of processing: Ireland – Privacy Policy.

Interaction with online survey platforms

This type of service allows Users to interact with third-party online survey platforms directly from the pages of Luminalpark.com.

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.

Hotjar Poll & Survey widgets (Hotjar Ltd.)

The Hotjar Poll & Survey widgets are services that enable interaction with the Hotjar platform provided by Hotjar Ltd. Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's opt-out information here.

Personal Data processed: Tracker, Usage Data and various types of Data.

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

Storage duration:

- _hjAbsoluteSessionInProgress: 30 minutes
- _hjCachedUserAttributes: duration of the session
- _hjClosedSurveyInvites: 1 year
- _hjDonePolls: 1 year
- hjFirstSeen: duration of the session
- hjIncludedInSessionSample: 30 minutes
- hjLocalStorageTest: duration of the session
- hjMinimizedPolls: 1 year
- hjSession*: 30 minutes
- hjSessionRejected: duration of the session
- hjSessionResumed: duration of the session
- hjSessionTooLarge: 1 hour
- hjSessionUser*: 1 year
- hjSessionUser *: 2 years
- hjShownFeedbackMessage: 1 year
- hjTLDTest: duration of the session
- hjUserAttributesHash: duration of the session •
- hjViewportId: duration of the session
- hjid: 1 year

Measurement

Luminalpark.com 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

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 Luminalpark.com, 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 Analytics Advertising Reporting Features (Google Ireland Limited)

Google Analytics on Luminalpark.com 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.

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: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

- IDE: 2 years
- _gcl_*: 3 months
- test_cookie: 15 minutes

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 Luminalpark.com, 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: Trackers.

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

Storage duration:

- _ga: 2 years
- _ga_*: 2 years

Meta Events Manager (Meta Platforms Ireland Limited)

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on Luminalpark.com.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

• _fbp: 3 months

Anonymized 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 anonymized form.

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

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of Luminalpark.com, 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. This integration of Google Analytics anonymizes 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 - Privacy Policy - Opt Out.

Storage duration:

- AMP_TOKEN: 1 hour
- _ga: 2 years
- _gac*: 3 months
- _gat: 1 minute
- _gid: 1 day

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 Luminalpark.com.

Google Optimize 360 (Google Ireland Limited)

Google Optimize 360 is an A/B testing service provided by Google Ireland Limited ("Google").

This service allows the Owner to target groups of Users on the base of their past use of Luminalpark.com. Users that <u>opt-out</u> 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: Ireland – <u>Privacy Policy</u>.

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

Heat mapping and session recording

Heat mapping services are used to display the areas of Luminalpark.com that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd. Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's <u>opt-out information here</u>.

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

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

Storage duration:

• _hjAbsoluteSessionInProgress: 30 minutes

- _hjCachedUserAttributes: duration of the session
- _hjClosedSurveyInvites: 1 year
- _hjDonePolls: 1 year
- _hjFirstSeen: duration of the session
- _hjIncludedInSessionSample: 30 minutes
- _hjLocalStorageTest: duration of the session
- _hjLocalStorageTest: duration of the session
- _hjMinimizedPolls: 1 year
- _hjSession*: 30 minutes
- _hjSessionRejected: duration of the session
- _hjSessionResumed: duration of the session
- _hjSessionTooLarge: 1 hour
- _hjSessionUser*: 1 year
- _hjSessionUser_*: 2 years
- _hjShownFeedbackMessage: 1 year
- _hjTLDTest: duration of the session
- _hjUserAttributesHash: duration of the session
- _hjViewportId: duration of the session
- _hjid: 1 year

Microsoft Clarity (Microsoft Corporation)

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation. Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: Trackers.

Place of processing: United States - Privacy Policy.

Storage duration:

- ANONCHK: 10 minutes
- CLID: 1 year
- MR: 7 days
- MUID: 1 year
- SM: duration of the session
- _clck: 1 year
- _clsk: 1 day

Marketing

Luminalpark.com 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 Luminalpark.com, 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.

Google Ads conversion tracking (Google Ireland Limited)

Google Ads conversion tracking is an analytics service provided by Google Ireland Limited that connects data from the Google Ads advertising network with actions performed on Luminalpark.com.

Personal Data processed: Trackers and Usage Data.

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Place of processing: Ireland – <u>Privacy Policy</u>.
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- IDE: 2 years
- test_cookie: 15 minutes

Criteo (Criteo SA)

Criteo is an advertising service provided by Criteo SA.

Personal Data processed: Tracker and Usage Data.

Legal basis for processing: Consent.

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

Data retention period: 1 year.

Storage duration:

- criteo_fast_bid: 7 days
- criteo_fast_bid_expires: 7 days
- cto_bundle: 2 years
- cto_bundle: indefinite
- cto_optout: 5 years
- cto_optout: indefinite
- optout: 5 years
- uid: 2 years

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 Luminalpark.com. 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

Microsoft Advertising (Microsoft Corporation)

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out.

Storage duration:

- MUID: 2 years
- _uetmsclkid: 3 months
- _uetmsclkid: indefinite
- _uetsid: 1 day
- _uetsid: indefinite
- _uetvid: 2 years
- _uetvid: indefinite

Remarketing and behavioral targeting

This type of service allows Luminalpark.com and its partners to inform, optimize and serve advertising based on past use of Luminalpark.com 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.

Adobe Audience Manager (Adobe Systems Software Ireland Limited)

Adobe Audience Manager is a remarketing and behavioral targeting service provided by Adobe Systems Software Ireland Limited.

Adobe Audience Manager makes use of tracking technologies to monitor User behavior. This Data is then used to personalize the User's experience and to provide targeted advertising. Adobe Audience Manager may also connect the collected Data with other networks, including advertising networks, and enable these parties to track and target the User. The Owner, unless otherwise specified in this document, has no direct relationship with the third parties that Adobe Audience Manager may be including.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- demdex: 6 months
- dextp: 6 months
- dst: 6 months

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>
- Brave
- <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).

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</u> <u>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 Luminalpark.com 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

Luminal Park S.r.l. - Via Mameli, 11 - 37126 Verona - Italia

Owner contact email: marco@luminalpark.com

Since the use of third-party Trackers through Luminalpark.com 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 Luminalpark.com.

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

Luminalpark.com (or this Application)

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

Service

The service provided by Luminalpark.com 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 Luminalpark.com, if not stated otherwise within this document.

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