# Cookie Policy of observerxtra.com

To find more information on California consumers and their privacy rights, Users may read the privacy policy.

To find more information on Virginia consumers and their privacy rights, Users may read the privacy policy.

To find more information on Colorado consumers and their privacy rights, Users may read the privacy policy.

To find more information on Connecticut consumers and their privacy rights, Users may read the privacy policy.

To find more information on Utah consumers and their privacy rights, Users may read the privacy policy.

This document informs Users about the technologies that help observerxtra.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 observerxtra.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, depending on the applicable law. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Observerxtra.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 observerxtra.com and delivery of the Service

Observerxtra.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.

# **Third-party Trackers**

# Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

# **Instapage (Instapage, Inc.)**

Instapage is a landing page management service provided by Instapage, Inc., that allows observerxtra.com to collect the email addresses of Users interested in its service.

Instapage allows 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 the created landing pages.

Personal Data processed: email address, Tracker and Usage Data.

Place of processing: United States – Privacy Policy.

#### **Further information about Personal Data**

#### iubenda Consent Solution localStorage (iubenda srl)

iubenda ConS JS library localStorage (IUB\_DATA) temporarily stores pending data in a storage space internal to the User's browser (localStorage) until it's received by the API, then it is deleted.

Personal Data processed: Tracker.

Place of processing: Italy – Privacy Policy.

### iubenda CCPA Cookie (usprivacy) (iubenda srl)

iubenda CCPA Cookie (usprivacy) is set by the iubenda Cookie Solution and stores California consumer opt-out choices in the local domain.

Personal Data processed: Tracker.

Place of processing: Italy – Privacy Policy.

#### iubenda Cookie Solution (remote consent Cookie) (iubenda srl)

Remote iubenda consent Cookie (\_iub\_cs-X) is set by the iubenda Cookie Solution and stores User preferences related to Trackers under the .iubenda.com domain.

Personal Data processed: Tracker.

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

# Collection of privacy-related preferences

This type of service allows observerxtra.com to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

#### iubenda Cookie Solution (iubenda srl)

The iubenda 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 observerxtra.com.

Personal Data processed: Trackers.

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

Storage duration:

• iub cs-\*: 1 year

• iub cs-\*-granular: 1 year

• euconsent-v2: 2 years

• usprivacy: 1 year

# Other activities involving the use of Trackers

# **Functionality**

Observerxtra.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 observerxtra.com, in order to contact and be contacted by observerxtra.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.

#### Facebook Messenger Customer Chat (Meta Platforms, Inc.)

The Facebook Messenger Customer Chat is a service for interacting with the Facebook Messenger live chat platform provided by Meta Platforms, Inc.

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

Place of processing: United States - Privacy Policy.

Storage duration:

• fbp: 3 months

# Registration and authentication

By registering or authenticating, Users allow observerxtra.com to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, observerxtra.com will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

#### Facebook Authentication (Meta Platforms, Inc.)

Facebook Authentication is a registration and authentication service provided by Meta Platforms, Inc. and is connected to the Facebook social network.

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

Place of processing: United States – Privacy Policy.

Storage duration:

• fbp: 3 months

• fbssls \*: duration of the session

#### Facebook Oauth (Meta Platforms, Inc.)

Facebook Oauth is a registration and authentication service provided by Meta Platforms, Inc. and is connected to the Facebook social network.

Personal Data processed: Tracker and various types of Data.

Place of processing: United States - Privacy Policy.

Storage duration:

• \_fbp: 3 months

#### WordPress.com Single Sign On (Automattic Inc.)

WordPress.com Single Sign On is a registration and authentication service provided by Automattic Inc. and is connected to the WordPress.com network.

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

Place of processing: United States – Privacy Policy.

Storage duration:

• tk or: 5 years

• tk r3d: 3 days

• tk rl: duration of the session

# **Experience**

Observerxtra.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 observerxtra.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 LLC)**

Google Fonts is a typeface visualization service provided by Google LLC that allows observerxtra.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

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

Instagram is an image visualization service provided by Meta Platforms, Inc. that allows observerxtra.com to incorporate content of this kind on its pages.

Personal Data processed: Tracker and Usage Data.

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

#### Issuu widget (Issuu, Inc)

Issuu is a digital content visualization service provided by Issuu, Inc. that allows observerxtra.com to incorporate content of this kind on its pages.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – Privacy Policy.

#### Google Programmable Search Engine with AdSense (Google LLC)

Google Programmable Search Engine is a search engine embedding service provided by Google LLC that allows observerxtra.com to incorporate content of this kind on its pages.

Google Programmable Search Engine may display AdSense advertisements. For details of which data are collected, please refer to the privacy policy of this service.

Personal Data processed: Tracker and Usage Data.

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

Storage duration:

• google auto fc cmp setting: indefinite

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

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows observerxtra.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

# Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of observerxtra.com.

The interaction and information obtained through observerxtra.com are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on observerxtra.com isn't being connected back to the User's profile.

# Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

• personalization id: 2 years

# Measurement

Observerxtra.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.

#### Wordpress Stats (Automattic Inc.)

Wordpress Stats is an analytics service provided by Automattic Inc.

Personal Data processed: Tracker and Usage Data.

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

Storage duration:

• tk tc: duration of the session

# Google Analytics (Google LLC)

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of observerxtra.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 – <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

# 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 observerxtra.com.

#### Google Optimize (Google LLC)

Google Optimize is an A/B testing service provided by Google LLC ("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.

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 is an A/B testing service provided by Google LLC ("Google").

This service allows the Owner to target groups of Users on the base of their past use of observerxtra.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: United States – 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

# Marketing

Observerxtra.com uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads

Some of the advertising services used by the Owner adhere to the <u>IAB Transparency and Consent Framework</u>, an initiative that facilitates responsible privacy practices across the digital advertising industry - providing Users with enhanced transparency and control over how their data are used for advertising tracking purposes. Users can customize their advertising preferences at any time by accessing the advertising preferences panel from within the cookie notice or via the relevant link on observerxtra.com.

Observerxtra.com participates in the IAB Europe Transparency & Consent Framework and complies with its Specifications and Policies. Observerxtra.com uses iubenda (identification number 123) as a Consent Management Platform.

# 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 observerxtra.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 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 observerxtra.com. 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.

# Prebid (Prebid.org, Inc.)

Prebid is an advertising service provided by Prebid.org, Inc.

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – Privacy Policy.

# Rubicon Project (The Rubicon Project, Inc.)

Rubicon Project is an advertising service provided by The Rubicon Project, Inc.

Personal Data processed: Tracker and Usage Data.

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

Storage duration:

- FPTrust: duration of the session
- audit: 1 year
- cd: duration of the session
- emilyRan: indefinite

fcap: indefinitekhaos: 1 yearkhaos: indefinitepux: indefinite

• sample number: indefinite

trp\_optout: 5 yearsuids: 3 monthsuids-audit: 3 months

# Google AdSense (Google LLC)

Google AdSense is an advertising service provided by Google LLC. This service uses the "DoubleClick" Cookie, which tracks use of observerxtra.com 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: Tracker and Usage Data.

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

Storage duration: up to 3 months

#### Meta Audience Network (Meta Platforms, Inc.)

Meta Audience Network is an advertising service provided by Meta Platforms, Inc. In order to understand Facebook's use of Data, consult <u>Facebook's data policy</u>.

Observerxtra.com may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Meta Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the <u>Facebook ad settings</u>.

Users may opt-out of certain Audience Network targeting through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Audience Network related sections of this privacy policy, if available.

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

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

#### Facebook Lookalike Audience (Meta Platforms, Inc.)

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Meta Platforms, Inc. that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of observerxtra.com or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of Trackers for ads personalization by visiting this opt-out page.

Personal Data processed: Tracker and Usage Data.

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

Storage duration:

• fbp: 3 months

# Google Ad Manager (Google LLC)

Google Ad Manager is an advertising service provided by Google LLC 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.

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

This service uses the "DoubleClick" Cookie, which tracks use of observerxtra.com and User behavior concerning ads, products and services offered.

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

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – Privacy Policy.

# Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- \_\_gads: 2 years
- \_\_gsas: 2 years\_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- gcl dc: 3 months
- gcl gb: 3 months
- gcl gf: 3 months
- gcl ha: 3 months
- id: 2 years
- test cookie: 15 minutes

#### Remarketing and behavioral targeting

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

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the Network Advertising Initiative opt-out page.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

# Facebook Remarketing (Meta Platforms, Inc.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of observerxtra.com with the Facebook advertising network.

Personal Data processed: Tracker and Usage Data.

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

Storage duration:

• fbp: 3 months

# Facebook Custom Audience (Meta Platforms, Inc.)

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of observerxtra.com with the Facebook advertising network.

Users can opt out of Facebook's use of Trackers for ads personalization by visiting this opt-out page.

Personal Data processed: email address and Tracker.

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

Storage duration:

• fbp: 3 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:

- 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 <u>YourOnlineChoices</u> (EU and UK), the <u>Network 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 observerxtra.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**

Woolwich Observer / a division of Cathedral Communications Inc 20-B Arthur Street North Elmira, Ontario Canada

Owner contact email: info@woolwichobserver.com

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

#### observerxtra.com (or this Application)

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

#### Service

The service provided by observerxtra.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 statement has been prepared based on provisions of multiple legislations.

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

Latest update: March 27, 2023