

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

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.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

### Collection of privacy-related preferences

This type of service allows this Application 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 Consent Solution (iubenda srl)

The iubenda Consent Solution allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

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

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

Storage duration:

- ConS JS library localStorage (IUB\_DATA): indefinite

#### 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 this Application.

Personal Data processed: Tracker.

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

Storage duration:

- `_iub_cs-*`: 1 year
- `_iub_cs-*-granular`: 1 year

- euconsent-v2: 2 years

## **SPAM protection**

This type of service analyzes the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

### **Google reCAPTCHA**

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

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, Tracker and Usage Data.

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

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Application 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**

### **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.

### **Google Fonts**

Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Tracker and Usage Data.

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

### **Google Maps widget**

Google Maps is a maps visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Tracker and Usage Data.

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

#### **YouTube video widget**

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Tracker and Usage Data.

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

Storage duration:

- PREF: 8 months
- VISITOR\_INFO1\_LIVE: 8 months
- YSC: duration of the session

#### **YouTube video widget (Privacy Enhanced Mode)**

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on this Application unless they play the video.

Personal Data processed: Tracker, Universally unique identifier (UUID) and Usage Data.

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

#### **User ID extension for Google Analytics**

Google Analytics on this Application makes use of a feature called User ID. This setup allows for a more accurate tracking of Users by associating that User with the same ID over various sessions and devices. It is set up in a way that doesn't allow Google to personally identify an individual or permanently identify a particular device.

The User ID extension might make it possible to connect Data from Google Analytics with other Data about the User collected by this Application.

The opt-out link below will only opt you out for the device you are on, but not from tracking performed independently by the Owner. Contact the Owner via the email address provided in this privacy policy to object to the aforementioned tracking as well.

Personal Data processed: Tracker.

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

#### **Google Analytics Advertising Reporting Features**

Google Analytics on this Application 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: Tracker, 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: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Storage duration:

- IDE: 2 years
- \_gcl\_\*: 3 months
- test\_cookie: 15 minutes

#### **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 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.

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 Demographics and Interests reports**

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for this Application (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

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

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

Storage duration:

- IDE: 2 years
- \_gcl\_\*: 3 months
- test\_cookie: 15 minutes

#### **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 with anonymized IP**

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 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.

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: 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

## 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 Application.

### 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

## Marketing

This Application 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 [IAB Transparency and Consent Framework](#), 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 this Application.

This Application participates in the IAB Europe Transparency & Consent Framework and complies with its Specifications and Policies. This Application 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 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 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 Application. 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 Ad Manager

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, 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 this Application 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](#); Ireland – [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

#### Google Ads Similar audiences

Similar audiences is an advertising and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of this Application. On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers 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 – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

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

### **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.

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

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

Personal Data processed: country, email address, first name, last name, Tracker and various types of Data.

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

### **Remarketing and behavioral targeting**

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

#### **Google Signals**

This Application uses Google Signals, a feature of Google Analytics, which will associate the visitation information that it collects from this Application with Google information from accounts of signed-in Google-account users who have consented to this association for the purpose of ads personalization. This Google information may include User location, search history, YouTube history and Data from sites that partner with Google – and is used to provide aggregated and anonymized insights into Users' cross device behaviors.

If a User falls under the described association, they [may access and/or delete such Data via My Activity](#) provided by Google.

Personal Data processed: Tracker and Usage Data.

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

#### **Remarketing with Google Analytics**

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the tracking activity performed by Google Analytics and its Trackers with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Tracker and Usage Data.

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

Storage duration:

- test\_cookie: 15 minutes
- IDE: 2 years
- \_gcl\_\*: 3 months

#### **Google Ads Remarketing**

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

In order to understand Google's use of Data, consult [Google's partner policy](#).

Users can opt out of Google's use of Trackers for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Tracker and Usage Data.

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

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

## **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**

GESCAMP SRL  
Via Appia Km 104,200  
04019 - Terracina (Latina)  
P.IVA 02067970596

**Owner contact email:** [info@lepalmevillage.com](mailto:info@lepalmevillage.com)

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.

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**Legal information**

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

Latest update: March 25, 2024

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