# Cookie Policy of www.commergo.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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.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.

#### **First-party Trackers**

# **Further information about Personal Data**

# **Preference Cookies (this Application)**

Preference Cookies store the User preferences detected on this Application in the local domain such as, for example, their timezone and region.

Personal Data processed: Tracker.

# **Third-party Trackers**

# **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 LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC. The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.

Personal Data processed: Cookies and Usage Data.

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

- GRECAPTCHA: duration of the session
- rc::a: indefinite
- rc::b: duration of the session
- rc::c: duration of the session

# Traffic optimization and distribution

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

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

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

#### Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

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

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

Place of processing: United States – Privacy Policy

# Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

#### **Stripe (Stripe Inc)**

Stripe is a payment service provided by Stripe Inc.

Personal Data processed: billing address, email address, first name, last name, payment info, purchase history, Tracker, Usage Data and various types of Data as specified in the privacy policy of the service.

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

Storage duration:

- Host-LinkSession: 2 years
- \_\_stripe\_mid: 1 year
- \_\_stripe\_sid: 30 minutes
- dashboard.banner-dismissals: duration of the session
- link.auth\_session\_client\_secret: duration of the session
- m: 2 years
- pay\_sid: 1 year

#### **Other Trackers**

# Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

# Clearpay

Personal Data: billing address; email address; first name; last name; payment info; purchase history; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service

# Other activities involving the use of Trackers

# **Functionality**

This Application uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

# **Contacting the User**

#### Mailing List or Newsletter (This Application)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data processed: address, city, company name, Cookies, country, date of birth, email address, first name, gender, last name, phone number, profession, province, state, Usage Data and ZIP/Postal code.

# **Experience**

This Application uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

# **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of this Application. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

#### Facebook Comments (Facebook, Inc.)

Facebook Comments is a content commenting service provided by Facebook, Inc. enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Cookies and Usage Data.

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

#### Comment system managed directly (This Application)

This Application has its own internal content comment system.

Personal Data processed: Cookies, email address, first name, last name, Usage Data, username and website.

# Displaying content from external platforms

This type of services 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 Programmable Search Engine (Google Inc.)

Google Programmable Search Engine is a search engine embedding 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: Cookies and Usage Data.

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

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

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

Personal Data processed: Cookies and Usage Data.

Place of processing: United States – 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: Trackers and Usage Data.

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

Storage duration:

• PREF: 8 months

VISITOR\_INFO1\_LIVE: 8 monthsYSC: duration of the session

#### YouTube Data API

YouTube Data API 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 functions normally executed on YouTube so that Users can watch, find, and manage YouTube content directly on this Application.

Through this Service, this Application may collect Data directly or indirectly on or from Users' devices, including by making use of Trackers. Users may restrict such access to their Data via the <u>security settings page</u> provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the <u>Network Advertising Initiative opt-out page</u>.

Personal Data processed: Data communicated in order to use the Service, Data communicated while using the service, device information, password, Trackers, Usage Data, User ID and username.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt out</u>.

# 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 this Application.

The interaction and information obtained through this Application 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 this Application isn't being connected back to the User's profile.

#### Facebook Like button and social widgets (Facebook, Inc.)

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

Personal Data processed: Cookies and Usage Data.

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

Storage duration:

• \_fbp: 3 months

#### 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: Cookies and Usage Data.

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

• personalization id: 2 years

#### PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Cookies and Usage Data.

Place of processing: See the PayPal privacy policy – Privacy Policy.

Storage duration:

- akavpau ppsd: duration of the session
- ts: duration of the session

#### LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

Storage duration:

• AnalyticsSyncHistory: 1 month

• JSESSIONID: duration of the session

• UserMatchHistory: 1 month

bcookie: 1 yearbscookie: 1 year

• lang: duration of the session

lide: 1 daylisse: 1 yearlms\_ads: 1 monthlms\_analytics: 1 month

#### AddThis (Oracle Corporation)

AddThis is a service provided by Oracle Corporation, which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of this Application.

Depending on the configuration, this service can display widgets belonging to third parties such as the managers of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.

Personal Data processed: Cookies and Usage Data.

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

Storage duration:

UID: 2 years\_atuvc: 2 yearsatuvs: 30 minutes

# Google Friend Connect (Google LLC)

Google Friend Connect is a social interaction service provided by Google LLC.

Personal Data processed: Cookies 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.

#### User ID extension for Google Analytics (Google Inc.)

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: Cookies.

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

#### Display Advertising extension for Google Analytics (Google Inc.)

Google Analytics on this Application might use Google's Interest-based advertising, 3rd-party audience data and information from the DoubleClick Cookie to extend analytics with demographics, interests and ads interaction data.

Personal Data processed: Cookies and Usage Data.

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

Storage duration:

• IDE: 2 years

• gcl \*: 3 months

• test cookie: 15 minutes

#### Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("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: Cookies and Usage Data.

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

Storage duration:

- AMP\_TOKEN: 1 hour
- ga: 2 years
- \_gac\*: 3 months
- \_gat: 1 minute \_gid: 1 day

# **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: browser information, city, device information, latitude (of city), longitude (of city), number of Users, session statistics, Trackers and Usage Data.

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

- \_ga: 2 years
- ga \*: 2 years

#### 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 Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("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: Cookies and Usage Data.

Place of processing: US - 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 Inc.)

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: Cookies and Usage Data.

Place of processing: US – 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 <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 this Application.

This Application participates in the IAB Europe Transparency & Consent Framework and complies with its Specifications and Policies. This Application uses inhenda (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.

#### **Microsoft Advertising (Microsoft Corporation)**

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Cookies and Usage Data.

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

# Storage duration:

• MUID: 2 years

\_uetmsclkid: 3 monthsuetmsclkid: indefinite

\_uetsid: 1 day \_uetsid: indefinite \_uetvid: 2 years uetvid: indefinite

#### Google AdSense (Google LLC)

Google AdSense is an advertising service provided by Google LLC. 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.

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

Personal Data processed: Cookies and Usage Data.

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

- 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 conversion tracking (Google LLC)

Google Ads conversion tracking is an analytics service provided by Google LLC that connects data from the Google Ads advertising network with actions performed on this Application.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

Storage duration:

• IDE: 2 years

• test\_cookie: 15 minutes

# 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 this Application.

The interaction and information obtained through this Application 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 this Application isn't being connected back to the User's profile.

# Facebook Like button and social widgets (Facebook, Inc.)

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

Personal Data processed: Cookies and Usage Data.

Place of processing: US - Privacy Policy.

Storage duration:

• fbp: 3 months

# 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: Cookies and Usage Data.

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

Storage duration:

• personalization id: 2 years

# PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Cookies and Usage Data.

Place of processing: See the PayPal privacy policy – Privacy Policy.

Storage duration:

- akavpau ppsd: duration of the session
- ts: duration of the session

# LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Cookies and Usage Data.

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

Storage duration:

AnalyticsSyncHistory: 1 monthJSESSIONID: duration of the session

• UserMatchHistory: 1 month

bcookie: 1 yearbscookie: 1 year

• lang: duration of the session

lide: 1 day
lisse: 1 year
lms\_ads: 1 month
lms analytics: 1 month

### AddThis (Oracle Corporation)

AddThis is a service provided by Oracle Corporation, which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of this Application.

Depending on the configuration, this service can display widgets belonging to third parties such as the managers of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.

Personal Data processed: Cookies and Usage Data.

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

Storage duration:

UID: 2 years\_atuvc: 2 yearsatuvs: 30 minutes

#### Google Friend Connect (Google LLC)

Google Friend Connect is a social interaction service provided by Google LLC.

Personal Data processed: Cookies and Usage Data.

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

# 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.

#### SendinBlue Email (SendinBlue SAS)

SendinBlue is an email address management and message sending service provided by SendinBlue SAS.

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

Place of processing: France – 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.

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

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.

#### Remarketing with Google Analytics (Google LLC)

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC that connects the tracking activity performed by Google Analytics and its Cookies with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Cookies and Usage Data.

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

Storage duration:

• test cookie: 15 minutes

IDE: 2 years\_gcl\_\*: 3 months

# Google Ad Manager Audience Extension (Google LLC)

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC that tracks the visitors of this Application and allows selected advertising partners to display targeted ads across the web to them.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States – 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

# Google Ads Remarketing (Google LLC)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.

Personal Data processed: Cookies and Usage Data.

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

# 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 <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 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**

Primis di Paolo De Felice, Viale G.Puccini, 1368 – 55100 Lucca, Italia

Owner contact email: www.commergo.com@gmail.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.

# Legal information

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

Latest update: March 07, 2024