# **Cookie Policy of whatabouttours.com**

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

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Whatabouttours.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.

# How whatabouttours.com uses Trackers

## **Necessary**

Whatabouttours.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.

## Trackers managed by third parties

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 whatabouttours.com, i.e., communication between whatabouttours.com and the User's browser, while also allowing analytical data from whatabouttours.com to be collected.

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

Place of processing: United States – Privacy Policy.

Trackers duration:

\_cfuvid: indefinitecf clearance: 30 minutes

# Cloudflare Bot Management (Cloudflare, Inc.)

Cloudflare Bot Management is a malicious bot protection and management service provided by Cloudflare, Inc.

Personal Data processed: app information, Application opens, browser information, browsing history, city, clicks, country, county, custom events, device information, device logs, geography/region, interaction events, IP address, keypress events, language, latitude (of city), launches, longitude (of city), metro area, motion sensor events, mouse movements, number of sessions, operating systems, page events, page views, province, scroll position, scroll-to-page interactions, search history, session duration, session statistics, state, touch events, Trackers, Usage Data, video views and ZIP/Postal code.

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

# Trackers duration:

• \_\_cf\_bm: 3 seconds

• \_\_cfruid: duration of the session

\_cfuvid: indefinitecf clearance: 30 minutes

cf\_ob\_info: 3 secondscf\_use\_ob: 3 secondscfmrk\_cic: 3 months

#### iubenda Consent Database (iubenda srl)

The iubenda Consent Database 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, IP address and Trackers.

Place of processing: Italy – Privacy Policy.

Trackers duration:

- ConS JS library localStorage (IUB\_DATA): indefinite
- cookie \_iub\_previous\_preference\_id: 2 years

## **Experience**

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

#### Trackers managed by third parties

## **Google Fonts (Google Ireland Limited)**

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

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – Privacy Policy.

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

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

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

## Measurement

Whatabouttours.com uses Trackers to measure traffic and analyse User behaviour to improve the Service.

#### Trackers managed by third parties

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

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of whatabouttours.com, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

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

Personal Data processed: Trackers and Usage Data.

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

Trackers duration:

• AMP TOKEN: 1 hour

\_ga: 2 years\_gac\*: 3 months\_gat: 1 minute\_gid: 1 day

#### Google Analytics (Universal Analytics) (Google Ireland Limited)

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of whatabouttours.com, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In order to understand Google's use of Data, consult their partner policy and their Business Data page.

Personal Data processed: Trackers and Usage Data.

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

Trackers duration:

• AMP\_TOKEN: 1 hour

\_ga: 2 years\_gac\*: 3 months\_gat: 1 minute\_gid: 1 day

# **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of whatabouttours.com, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

In order to understand Google's use of Data, consult their partner policy and their Business Data page.

Personal Data processed: number of Users, session statistics, Trackers and Usage Data.

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

Trackers duration:

\_ga: 2 years\_ga\_\*: 2 years

## How to manage preferences and provide or withdraw consent on whatabouttours.com

Whenever the use of Trackers is based on consent, users can provide or withdraw such consent by setting or updating their preferences via the relevant privacy choices panel available on whatabouttours.com.

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.

#### How to control or delete Cookies and similar technologies via your device settings

Users may use their own browser settings to:

- See what Cookies or other similar technologies have been set on the device;
- Block Cookies or similar technologies;
- Clear Cookies or similar technologies from the browser.

The browser settings, however, do not allow granular control of consent by category.

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).

## 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 whatabouttours.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**

Maksym Chernysh, What About Tours, Rome (Italy), Via dei Licheni 15a

Owner contact email: info@whatabouttours.com

Since the use of third-party Trackers through whatabouttours.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 whatabouttours.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 whatabouttours.com (or third-party services employed in whatabouttours.com), which can include: the IP addresses or domain names of the computers utilized by the Users who use whatabouttours.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 whatabouttours.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

whatabouttours.com. The Data Controller, unless otherwise specified, is the Owner of whatabouttours.com.

## whatabouttours.com (or this Application)

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

#### Service

The service provided by whatabouttours.com as described in the relative terms (if available) and on this site/application.

## **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

#### Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

#### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

# **Legal information**

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

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