# Cookie Policy of workero.com

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Workero.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 workero.com and delivery of the Service

Workero.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.

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

Storage duration: up to 3 months

# **Third-party Trackers**

# Tag Management

This type of service helps the Owner to manage the tags or scripts needed on workero.com 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 Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Tracker.

Place of processing: Ireland – Privacy Policy.

#### **Other Trackers**

# **Collection of privacy-related preferences**

This type of service allows workero.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.

#### **Exercise your rights under GDPR**

Individuals may contact Workero to exercise their rights under the GDPR (rights of access, rectification, erasure, portability, etc.). Where personal data is processed by electronic means, Workero is providing means for requests to be made electronically. Workero will respond to your request their without undue delay, and in principle within 1 month of the request.

To exercise your rights please complete the form. https://join.workero.com/gdpr-form/

# Other activities involving the use of Trackers

# **Functionality**

Workero.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.

#### Registration and authentication

By registering or authenticating, Users allow workero.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, workero.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 Oauth (Meta Platforms Ireland Limited)

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

Personal Data processed: Tracker and various types of Data.

Place of processing: Ireland – Privacy Policy.

Storage duration: indefinite

#### Measurement

Workero.com uses Trackers to measure traffic and analyze User behavior to improve the Service.

# **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

#### Google Analytics (Google Ireland Limited)

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

# Google Analytics Advertising Reporting Features (Google Ireland Limited)

Google Analytics on workero.com has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

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

Personal Data processed: Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and various types of Data as specified in the privacy policy of the service.

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

#### Storage duration:

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

• test cookie: 15 minutes

# **Marketing**

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

#### Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on workero.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 workero.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.

#### Google Ad Manager (Google Ireland Limited)

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

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – Privacy Policy.

Storage duration:

• IDE: 2 years

• test\_cookie: 15 minutes

#### Remarketing and behavioral targeting

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

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### LinkedIn Website Retargeting (LinkedIn Corporation)

LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of workero.com with the LinkedIn advertising network.

Personal Data processed: Trackers and Usage Data.

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

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

#### User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to workero.com, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving workero.com.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on workero.com.

# Intercom (Intercom R&D Unlimited Company)

Intercom is a User database management service provided by Intercom R&D Unlimited Company.

Intercom can also be used as a medium for communications, either through email, or through messages within workero.com. Intercom Messenger may use Trackers to recognize and track Users behavior.

Personal Data processed: Data communicated while using the service, email address, Tracker, Universally unique identifier (UUID), Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – Privacy Policy.

Storage duration:

• intercom-id-\*: 10 months

- intercom-session-\*: 7 days
- intercom-test: indefinite

# 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 workero.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**

Workero NV - Avenue des Arts 56 - 1000 Brussels - Belgium

Owner contact email: info@workero.com

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

# workero.com (or this Application)

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

# Service

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

Latest update: March 08, 2024