Cookie Policy of UPG www.italianfoodacademy.com

This document informs Users about the technologies that help this Website 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 Website.

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.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

Necessary

This Website 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.

Experience

This Website 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 visualisation service provided by Google Ireland Limited that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

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

Marketing

This Website uses Trackers to deliver personalised ads or marketing content, and to measure their performance.

Trackers managed by third parties

Meta Audience Network (Meta Platforms, Inc.)

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

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

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

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

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

Trackers duration:

• lastExternalReferrer: duration of the session

• lastExternalReferrerTime: duration of the session

Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on this Website. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

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

Trackers duration:

_fbc: 3 months_fbp: 3 monthsfr: 3 months

• lastExternalReferrer: duration of the session

• lastExternalReferrerTime: duration of the session

Meta Lookalike Audience (Meta Platforms, Inc.)

Meta Lookalike Audience is an advertising and behavioural targeting service provided by Meta Platforms, Inc. that uses Data collected through Meta's Custom Audience in order to display ads to Users with similar behaviour to Users who are already in a Custom Audience list on the basis of their past use of this Website or engagement with relevant content across Meta's apps and services. On the basis of these Data, personalised ads will be shown to Users suggested by Meta Lookalike Audience.

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

Personal Data processed: Trackers and Usage Data.

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

Trackers duration:

• _fbp: 3 months

• lastExternalReferrer: duration of the session

• lastExternalReferrerTime: duration of the session

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. This service uses the "DoubleClick" Cookie, which tracks use of this Website and User behaviour 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 their partner policy and their Business Data page.

Personal Data processed: Trackers and Usage Data.

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

Trackers duration:

Conversion: 3 monthsDSID: 14 daysFCNEC: 1 yearFLC: 10 seconds

• FPAU: 3 months

- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- GCL AW P: 3 months
- GED_PLAYLIST_ACTIVITY: duration of the session
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- __gads: 2 years
- __gpi: 2 years
- __gpi_optout: 2 years
- __gsas: 2 years
- _gac_: 3 months
- _gac_gb_: 3 months
- _gcl_ag: 3 months
- _gcl_au: 3 months
- _gcl_aw: 3 months
- _gcl_dc: 3 months
- gei_de. 5 months
- _gcl_gb: 3 months _gcl_gf: 3 months
- _gcl_gs: 3 months
- _gcl_ha: 3 months
- ar_debug: 3 months
- id: 2 years
- receive-cookie-deprecation: 6 months
- test_cookie: 15 minutes

Facebook Remarketing (Meta Platforms, Inc.)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. that connects the activity of this Website with the Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

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

Trackers duration:

- _fbp: 3 months
- datr: 2 years
- lastExternalReferrer: duration of the session

Meta Custom Audience (Meta Platforms, Inc.)

Meta Custom Audience is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. that connects the activity of this Website with the Meta Audience Network.

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

Personal Data processed: email address and Trackers.

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

Trackers duration:

- _fbp: 3 months
- lastExternalReferrer: duration of the session
- lastExternalReferrerTime: duration of the session

How to manage preferences and provide or withdraw consent on this Website

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 this Website.

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).

How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by YourOnlineChoices (EU), 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 <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

Consequences of denying consent

Users are free to decide whether or not to grant consent. However, please note that Trackers help this Website to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, in the absence of the User's consent, the Owner may be unable to provide related features.

Owner and Data Controller

Upgrade Srl Via A. Albricci, 9 20122 Milano P.IVA 10282180966

Owner contact email: privacy@italianfoodacademy.com

Since the use of third-party Trackers through this Website 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 Website.

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 Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilised by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised 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 Website 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 Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

This Website (or this Application)

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

Service

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

Latest update: 3 April 2025

Version: 2