

PRIVACY AND COOKIE POLICY

This information, intended for all those who browse this portal (hereinafter, "**Portal**"), is issued pursuant to art. 13 of Reg. (EU) no. 2016/679 (hereinafter, "**GDPR"**) and in accordance with art. 122 of d. lgs. 196/2003 (hereinafter, "**Privacy Code**"), as well as with the provision on cookies of the Privacy Guarantor of 8 May 2014, as supplemented by the provision of 10 June 2021 (hereinafter, "**Provision**").

1. Identity and contact details of the data controller

The data controller is **Amilon S.r.l.,** Tax Code and VAT 05921090964, with registered office in via Natale Battaglia n. 12, Milan, e-mail address <u>privacy@amilon.eu</u> (hereinafter, "**Data Controller**" or "**Amilon**").

2. Contact details of the Data Protection Officer (DPO)

The DPO can be contacted at the e-mail address <u>dpo-ext@amilon.eu</u>.

3. Types of data processed

a. Navigation data

The computer systems and software procedures used to operate the Portal acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of computers and terminals used by users, addresses in URI / URL (Uniform Resource Identifier / Locator) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.

These data, necessary for the use of web services, are also processed for the purpose of:

- allow access to the Portal and the use of its features;
- allow and monitor the correct functioning of the Portal and carry out maintenance activities;
- obtain anonymous statistical information on the use of the Portal;
- ascertaining any responsibility in case of hypothetical computer crimes against the Portal and to exercise and / or defend the rights of the Data Controller.

The legal bases of the processing carried out for the aforementioned purposes are the execution of a contract of which the interested party is a party and the pursuit of the legitimate interest of the Data Controller.

b. Data provided voluntarily by the user

In order to use certain services on the Portal, it is necessary to provide personal data, in relation to which reference is made to the specific information provided at the time of collection.

c. Information processed by cookies

The Portal uses cookies.

What are cookies

Cookies (or markers) are small text files that are sent by the web server visited by the user on the user's device (usually to the browser), when the latter accesses a particular site with the purpose of storing and transporting information. They are stored so that you can recognize this device the next time you visit. At each subsequent visit, in fact, cookies are sent back from the user's device to the site.

Each cookie generally contains the name of the server from which the cookie was sent and the expiration date and a value, usually a unique number randomly generated by the computer.

First-party and third-party cookies

Cookies can be installed not only by the same operator of the site visited by the user (first-party cookies), but also by a different site that installs them through the first site (third-party cookies) and is able to recognize them. This happens because on the visited site there may be elements (images, maps, sounds, links to web pages of other domains, etc.) that reside on servers other than that of the site visited.



Technical, analytical and profiling cookies

Depending on the purpose, cookies are divided into technical cookies and profiling cookies.

Technical **cookies** are installed for the sole purpose of "*carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide this service" (cf. art. 122, co. 1, Privacy Code). They are usually used to allow efficient navigation between pages, store user preferences, store information on specific user configurations, authenticate users, etc.*

Technical cookies can be divided into navigation cookies, used in order to record data useful for the normal navigation and use of the website on the user's computer (allowing, for example, to remember the preferred size of the page in a list) and functional cookies, which allow the website to remember the choices made by the user in order to optimize its functionality (for example, Functional cookies allow the site to remember user-specific settings, such as country selection and, if set, permanent login status). Some of these cookies (called essential or strictly necessary) enable functions without which it would not be possible to perform some operations.

Pursuant to the aforementioned art. 122, co. 1, Privacy Code, the use of technical cookies does not require the consent of users, but only requires the obligation to inform users.

Pursuant to the Provision, technical cookies are assimilated - and, therefore, for their installation, the consent of users is not required - so-called cookies. analytics if:

- i) created and used directly by the operator of the first party site (without, therefore, the intervention of third parties) for the purpose of optimizing the same to collect aggregate information on the number of users and how they visit the site, as well as
- ii) manufactured and made available by third parties if:
 - a. used by the first-party site for mere statistical purposes, if appropriate minimization measures are adopted to reduce its identifying power (for example, by masking appropriate portions of the IP address) and used solely for the production of aggregate statistics and in relation, as a rule, to a single site or a single mobile application, so as not to allow the tracking of the navigation of the person who uses different applications or navigates sites different webs;
 - b. Third parties, who provide the Web Measurement service to the Site, do not combine, enrich or cross the data, even minimized as above, with other information available to these third parties (eg customer files or statistics of visits to other sites) nor transmit them to other third parties.

Profiling **cookies or similar markers** (e.g. pixels, fingerprints, etc.) are used to track the user's navigation, analyze his behavior for marketing purposes and create profiles on his tastes, habits, choices, etc. in order to transmit targeted advertising messages in relation to his user interests and in line with the preferences expressed by them in online browsing. These instruments, pursuant to art. 122 of the Privacy Code, can be installed on the user's terminal only if he has expressed his consent after being informed with the simplified procedures indicated by the Guarantor in the Provision (publication on the site of a "short" information contained in an immediate pop-up banner on the home page (or other page through which the user can access the site), that refers to an "extended" information, which is accessed through a link clickable by the user).

Persistent and session cookies

Based on their duration, cookies are divided into **persistent**, which remain stored, until they expire, on the user's device, unless removed by the latter, and **session**, which are not stored permanently on the user's device and disappear when the browser is closed.

List of cookies and other tracking tools used by the Portal

The website uses the cookies listed below. Please note that Amilon uses the <u>Transparency and Consent Framework 2.0 ("TCF 2.0"</u>) of the Interactive Advertising Bureau Europe (IAB Europe) association and that therefore the cookies developed by the Vendors participating in TCF 2.0 are classified according to purposes established by IAB Europe.

Technical cookies

The Portal uses cookies or other technical tools, installed for the purposes indicated below, for which the prior consent of users is not required pursuant to art. 122 of the Privacy Code.



Below, for each tool used, the name, the purpose of use and the duration are reported.

NAME	FIRST/THIRD PARTY	DESCRIPTION (PURPOSE)	DURATION
TC_OPTOUT_CENTER	Amilon	Used to store the user's cookie consent preferences.	396 days
TC_OPTOUT	Amilon	Used to store the user's cookie consent preferences.	396 days
TCPID	Amilon	Used to identify the user to whom the banner of the short information is shown.	365 days
Catalogue	Amilon	Used to store the selected language of the gift card catalog.	1 day
CartProducts	Amilon	This cookie is used for the proper functioning of the shopping cart on this website.	Session
.AspNetCore.Antiforgery.#	Amilon	Helps prevent cross-request forgery (CSRF) attacks.	Session
.AspNetCore.Identity.Applicat ion	Amilon	Used to store session data while browsing this site.	9 days
Lang	Amilon	Used to store the language selected while browsing this site.	Session
ssID	Amilon	Unique identifier.	30 minutes
_goc	Amilon	Used to manage operations history for guest users.	1 minute
_GRECAPTCHA	Google Inc.	This cookie is set by Google and is necessary to distinguish between humans and robots in order to make valid reports on the use of the site.	180 days

Anonymized analytical cookies

The Portal uses analytical cookies created and made available by third parties to statistically analyze accesses or visits to the Portal itself, allow the Data Controller to improve its structure, navigation logic and contents and collect information on the use of the Portal.

For more details and information you can visit the following link: <u>https://support.google.com/analytics/answer/1011397</u>

These cookies, appropriately anonymized (by masking significant portions of the IP address), allow the collection of aggregate information on the number of users and how they visit the Portal without being able to identify the individual user. Therefore, the prior consent of users is not required, in accordance with what is indicated in the Measure.

Below, for each analytical cookie used, the name, the first or third party to which it refers, the purpose of use and the duration.

NAME	FIRST / THIRD PARTY	DESCRIPTION (PURPOSE)	DURATION
ga#	Google Inc.	Used by Google Analytics to collect data on the number of times a user has visited the website and the dates of the first and most recent visit.	2 years
_ga	Google Inc.	It contains a unique identifier used by Google Analytics to determine that two separate visits belong to the same user across browsing sessions.	730 days



Profiling tools

Profiling cookies are used on the Portal, for which, as indicated above, the prior consent of users is required pursuant to art. 122 of the Privacy Code and in accordance with the Provision.

Below is the name of the instrument, the third party to which it refers, the purpose of use and duration of the same, as well as the link to the privacy policy of that third party.

NAME	FIRST / THIRD PARTY	DESCRIPTION (PURPOSE)	DURATION
MUID		This cookie is installed by Microsoft Clarity and identifies unique web browsers that visit Microsoft sites. These	
		cookies are used for advertising, site analysis and other	
	<u>Microsoft</u>	operational purposes.	390 days
		For further information, please visit:	
		https://learn.microsoft.com/clarity/setup-and-	
		installation/cookie-list	
NAP	<u>Microsoft</u>	This cookie is installed by Microsoft Clarity and stores	
		information about how visitors use the website. The	
		cookie contributes to the creation of an analysis report.	105 days
		For further information, please visit:	,-
		https://learn.microsoft.com/clarity/setup-and-	
		installation/cookie-list	
ANON		This cookie is installed by Microsoft Clarity and stores information about how visitors use the website. The	
		cookie contributes to the creation of an analysis report.	
	<u>Microsoft</u>	For further information, please visit:	105 days
		https://learn.microsoft.com/clarity/setup-and-	
		installation/cookie-list	
		This cookie is installed by Microsoft Clarity and identifies	
CLID		the first time a user is seen on any site that uses Clarity.	
	Microsoft	For further information, please visit:	365 days
	<u>wheresore</u>	https://learn.microsoft.com/clarity/setup-and-	
		installation/cookie-list	
MR		This cookie is installed by Microsoft Clarity and indicates	7 days
	<u>Microsoft</u>	whether to update MUID.	
		For further information, please visit:	
		https://learn.microsoft.com/clarity/setup-and-	
		installation/cookie-list	
	Microsoft	This cookie is installed by Microsoft Clarity and is used in	Session
		synchronizing the MUID across Microsoft domains.	
SM		For further information, please visit:	
		https://learn.microsoft.com/clarity/setup-and-	
		installation/cookie-list	
		This cookie is installed by Microsoft Clarity and persists	365 days
	<u>Microsoft</u>	the Clarity user ID and preferences, which are unique to	
_clck		that site and attributed to the same user ID.	
		For further information, please visit:	
		https://learn.microsoft.com/clarity/setup-and-	
_clsk		installation/cookie-list	
	<u>Microsoft</u>	This cookie is installed by Microsoft Clarity and identifies	1 day
		unique web browsers that visit Microsoft sites. These	
		cookies are used for advertising, site analysis and other	
		operational purposes.	
		For further information, please visit:	



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4. Provision of data

Without prejudice to the above on cookies and similar markers used on the Portal, navigation data are necessary to implement computer and telematic protocols.

The freedom of the interested party to give or not consent to profiling through the tracking tools indicated above remains unaffected.

5. Recipients

The processing operations connected to the web services of the Portal are carried out by personnel expressly authorized to process the processing who have received adequate operating instructions.

The data will be communicated to the third parties indicated in the tables above that process them for the purposes specified therein as independent owners.



The data may be communicated to public authorities, entitled to process them, which will operate as independent data controllers.

Where the data are transferred to countries outside the European Union (EU) or the European Economic Area (EEA) that have not been deemed adequate by the European Commission, the "transfer tools" referred to in art. 45 of the GDPR, evaluating the possible provision of "additional measures" to guarantee a level of protection substantially equivalent to that required by European Union law. For more information, see the links to the information of the third parties indicated in the table.

6. How to issue and revoke consent to the installation of profiling cookies

Profiling cookies will be installed on your devices only with prior consent, expressed by selecting the "Accept all cookies" button within the banner containing the brief information. The consent to the use of cookies is recorded with a special "technical cookie".

Where the user clicks on the "X" button, profiling cookies will not be installed.

It is always possible to change your choice and, in particular, revoke the consent previously given, by clicking on "Cookie settings" at the bottom of each page of the Portal.

Users can still express their options on cookies also through the settings of the browser used. Even if the web browser used by the user is set to automatically accept cookies, the latter can change the default configuration through the settings menu, deleting and / or removing all or some cookies, blocking the sending of cookies or limiting it to certain sites. Disabling, blocking cookies or deleting them could compromise the optimal use of some areas of the Portal or prevent some features of the same, as well as affect the functioning of third-party services. Below are the links to the guides for managing cookies of the main browsers:

- Microsoft Internet Explorer
- Microsoft Edge
- Google Chrome
- Mozilla Firefox
- <u>Safari</u>
- <u>Work</u>

For browsers other than those listed above, it is necessary to consult the relative guide to identify how to manage cookies.

7. The rights of the interested parties

In relation to the processing of personal data carried out by the Data Controller, the interested party, in addition to what is indicated in the previous paragraph, may exercise the rights referred to in Articles. from 15 to 22 of the GDPR, where applicable, among which you can request access to data concerning you and to the information referred to in art. 15 (purpose of processing, categories of personal data, etc.), their cancellation in the cases provided for by art. 17, the correction of inaccurate data, the integration of incomplete data, the limitation of processing in the cases provided for by art. 18, in addition to data portability (i.e. to receive data in a structured format, commonly used and readable by automatic device, as well as, if technically feasible, to transmit them to another holder without hindrance) in the event that the processing is based on consent or contract and is carried out with automated tools.

To exercise the rights, the interested party can contact the Data Controller at the contact points indicated in par. 1.

The interested party has the right to lodge a complaint with the competent supervisory authority in the Member State where he habitually resides or works or in the State in which the alleged violation occurred.