# **Cookie Policy of issapulire.com**

To find more information on California consumers and their privacy rights, Users may read the privacy policy.

To find more information on Virginia consumers and their privacy rights, Users may read the privacy policy.

To find more information on Colorado consumers and their privacy rights, Users may read the privacy policy.

To find more information on Connecticut consumers and their privacy rights, Users may read the privacy policy.

To find more information on Utah consumers and their privacy rights, Users may read the privacy policy.

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 Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Issapulire.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 issapulire.com and delivery of the Service

Issapulire.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**

# Registration and authentication provided directly by issapulire.com

By registering or authenticating, Users allow issapulire.com to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

# **Direct registration (issapulire.com)**

The User registers by filling out the registration form and providing the Personal Data directly to issapulire.com.

Personal Data processed: billing address, city, company name, country, email address, field of activity, first name, house number, language, last name, physical address, state, Trackers, Usage Data, User ID and ZIP/Postal code.

# **Third-party Trackers**

# **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on issapulire.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 LLC)

Google Tag Manager is a tag management service provided by Google LLC.

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

Personal Data processed: Trackers.

Place of processing: United States – Privacy Policy.

# Other activities involving the use of Trackers

# **Functionality**

Issapulire.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.

#### **Contacting the User**

#### Contact form (issapulire.com)

By filling in the contact form with their Data, the User authorizes issapulire.com to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: company name, country, email address, field of activity, first name, last name, phone number, state, Trackers, VAT Number, website and ZIP/Postal code.

# **Experience**

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

# Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of issapulire.com and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction. 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 Fonts (Google LLC)

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

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

#### YouTube video widget (Google LLC)

YouTube is a video content visualization service provided by Google LLC that allows issapulire.com 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>.

Storage duration:

• PREF: 8 months

VISITOR\_INFO1\_LIVE: 8 months

• YSC: duration of the session

#### YouTube video widget (Privacy Enhanced Mode) (Google LLC)

YouTube is a video content visualization service provided by Google LLC that allows issapulire.com to incorporate content of this kind on its pages. This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on issapulire.com unless they play the video.

Personal Data processed: Trackers, Universally unique identifier (UUID) and Usage Data.

Place of processing: United States – Privacy Policy.

#### 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 issapulire.com. The interaction and information obtained through issapulire.com 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 issapulire.com isn't being connected back to the User's profile.

#### X Post button and social widgets (X Corp.)

The X Post button and social widgets are services allowing interaction with the X social network provided by X Corp.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

personalization\_id: 2 years

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

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

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

Storage duration:

• \_fbp: 3 months

# Measurement

Issapulire.com uses Trackers to measure traffic and analyse User behaviour 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 (Universal Analytics) (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of issapulire.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: United States – Privacy Policy – Opt Out.

Storage duration:

• AMP TOKEN: 1 hour

\_ga: 2 years\_gac\*: 3 months

gac : 3 monutegat: 1 minute

• \_gat: 1 minut

• gid: 1 day

Google Analytics 4 is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of issapulire.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: United States – Privacy Policy – Opt Out.

Storage duration:

- \_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 (Universal Analytics) with anonymized IP (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of issapulire.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 their partner policy and their Business Data page.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – <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

# Marketing

Issapulire.com uses Trackers to deliver personalised marketing content based on User behaviour 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 issapulire.com.

Issapulire.com participates in the IAB Europe Transparency & Consent Framework and complies with its Specifications and Policies. Issapulire.com uses iubenda (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 issapulire.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 issapulire.com. For more information, please check the privacy policies of the relevant services. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

#### LinkedIn Ads

LinkedIn Ads is an advertising service provided by LinkedIn Ireland Unlimited Company or by LinkedIn Corporation, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers and Usage Data.

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

#### Storage duration:

- GAID: indefinite • IDFA: indefinite
- UserMatchHistory: 1 month
- \_gcl\_\*: 3 months • \_guid: 3 months • aam uuid: 1 month • li fat id: 1 month • li\_giant: 7 days
- li sugr: 3 months • lms ads: 1 month
- oribi\_cookie\_test: duration of the session
- oribi\_session: 2 hours • oribi\_user\_guid: 7 months

# LinkedIn conversion tracking (LinkedIn Insight Tag) (LinkedIn Corporation)

LinkedIn conversion tracking (LinkedIn Insight Tag) is an analytics and behavioral targeting service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on issapulire.com. The LinkedIn Insight Tag tracks conversions that can be attributed to LinkedIn ads and enables to target groups of Users on the base of their past use of issapulire.com.

Users may opt out of behavioral targeting features through their device settings, their LinkedIn account settings or by visiting the AdChoices opt-out page.

Personal Data processed: device information, Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

# Storage duration:

- AnalyticsSyncHistory: 1 month
- JSESSIONID: duration of the session
- UserMatchHistory: 1 month
- bcookie: 1 year • bscookie: 1 year
- lang: duration of the session
- lidc: 1 day • lms ads: 1 month
- lms\_analytics: 1 month

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

With regard to any third-party Trackers, Users can manage their preferences and withdraw their consent (TO BE REMOVED) 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 <a href="YourOnlineChoices">YourOnlineChoices</a> (EU and UK), the <a href="YourOnlineChoices">Network</a> (Advertising Initiative (US) and the <a href="Digital Advertising Alliance">Digital Advertising Alliance</a> (US), <a href="DAAC">DAAC</a> (Canada), <a href="DDAI">DDAI</a> (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 issapulire.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**

ISSA PULIRE Network srl via Felice Casati, 32 20124 Milano Italia

Owner contact email: info@issapulirenetwork.com

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

The individual using issapulire.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 issapulire.com. The Data Controller, unless otherwise specified, is the Owner of issapulire.com.

# issapulire.com (or this Application)

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

#### Service

The service provided by issapulire.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 statement has been prepared based on provisions of multiple legislations.

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

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