

# Cookie Policy

This page describes the methods and purposes of the processing, carried out through cookies, of the personal data of users (hereinafter referred to as the “Users” or the “Data Subjects”) who visit the website [www.studioinzaghi.com](http://www.studioinzaghi.com) (the “Site”).

For more information regarding other personal data processing activities carried out on the Site, please refer to the Site’s Privacy Policy at the following link: [https://www.studioinzaghi.com/wp-content/uploads/2024/07/privacy-policy-studio-inzaghi\\_2024\\_eng.pdf](https://www.studioinzaghi.com/wp-content/uploads/2024/07/privacy-policy-studio-inzaghi_2024_eng.pdf)

## 1. Contact details of the Data Controller

The Data Controller is SI – Studio Inzaghi, VAT: 13282910960, with its registered office at Piazza Eleonora Duse, 3, Milan, phone: +39 02 7600 8581, email: [info@studioinzaghi.com](mailto:info@studioinzaghi.com) (the “Controller”).

## 2. What are cookies

2.1 Cookies are small text files that websites send automatically to the user’s device (usually to the browser), where they are stored and then retransmitted to the same websites and are generally used for different purposes: executing computer authentications, session tracking, storing information about specific configurations regarding users, storing preferences, etc.

2.2 Depending on the website or domain that installs the cookies, they can be distinguished into:

- a) first-party cookies: installed on the user’s device directly by the owner or operator of the website the User is visiting;
- b) third-party cookies: installed through the website the user is visiting by owners of different websites or web servers.

2.3 Based on the duration of the cookies’ validity, they can be divided into:

- a) session cookies: temporarily stored on the user’s device until the browser session ends. Such cookies are usually necessary for the proper functioning of the website’s applications and features;
- b) persistent cookies: stored on the user’s device for a longer period of time than a single browsing session, depending on their function and the user’s preferences. Persistent cookies allow information to be retransmitted to the web server upon each subsequent access to the site.

2.4 Based on the purposes pursued, cookies can be grouped into two macro-categories:

- a) “technical” cookies, which, being strictly necessary to provide a service requested by the user, do not require the user’s consent. Without these, some operations could not be performed or would be more complex and/or less secure. Therefore, they are automatically installed upon access to the site. They include: (i) browsing cookies, which ensure normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access reserved areas), (ii) functionality cookies

(which allow the user to navigate based on a set of selected criteria, such as language);

- b) "profiling" cookies, used to link specific actions or recurring behavioral patterns in the use of the site's features to specific, identified or identifiable subjects, in order to group different profiles into homogeneous clusters of varying sizes, allowing the owner, among other things, to tailor the service more and more personalized beyond what is strictly necessary for service provision, as well as to send targeted advertising messages aligned with the user's preferences expressed during online navigation. This category also includes so-called "social cookies," i.e., cookies from social networks used according to the relevant social network's policies, and so-called "analytical cookies" - used to analyze site access and visits, allowing the owner to improve the structure, navigation logic, and content of the site, to evaluate the effectiveness of a provided service, or to help measure "traffic," i.e., the number of visitors, possibly broken down by geographic area, connection time slot, or other characteristics - unless they are similar to technical cookies, which is possible only when (i) the use of analytical cookies is limited solely to producing aggregate statistics and they are used in relation to a single site or a single mobile application, so as not to allow tracking of a person's navigation who uses different applications or visits different websites, (ii) they are created and used directly by the first-party site, or, if third-party, appropriate tools are adopted to reduce their identifying power (by masking significant portions of the IP address) and (iii) there are contractual constraints between the sites and third parties, expressly referring to the third party's commitment to use them exclusively for service provision, keep them separately, and not "enrich" or "cross-reference" them with other information they may have, nor transmit them to further third parties.

Since profiling cookies are not strictly necessary for the website's operation, their installation requires users' consent.

### 3. Cookies used on the Data Controller's Site

- 3.1 The site uses the following technical cookies, which, being strictly necessary, cannot be disabled via the "manage options" tool. For each of the listed technical cookies, in addition to the specific function, the cookie's validity period and source are indicated:

COOKIE NAME	SOURCE	FUNCTION	DURATION
_cookie_privacy_accepted	Owner	Records cookie acceptance preferences	182 days

- 3.2 The site also uses the following profiling cookies, specifically, third-party "analytical cookies." The Data Controller has no control over the process used by third-party sites to collect information about the Site's browsing, linked to the personal data they hold. Therefore, we invite you to consult the privacy policies of third parties, whose links are indicated in the table below, to understand their use purposes, including advertising, of the information they may collect. Such policies should also allow you to make your choices regarding consent with these third parties, through the methods they provide. For each cookie listed in the table below, in addition to the specific function, the cookie's validity period and the respective proprietary or

third-party source are indicated; a link to the third party's privacy policy and consent form is also present, where you can make any relevant choices.

#### Analytical cookies

COOKIE NAME	SOURCE	FUNCTION	DURATION	INFORMATION AND CONSENTS
_ga	Third Party: Google Analytics	<b>Analytics:</b> allow for monitoring and analyzing traffic data and serve to track user behavior in order to improve the user experience.	1 year	<a href="https://policies.google.com/privacy?hl=it">https://policies.google.com/privacy?hl=it</a>
_gat_gtag_*	Third Party: Google Analytics	<b>Analytics:</b> used to store a single visitor	1 min	<a href="https://policies.google.com/privacy?hl=it">https://policies.google.com/privacy?hl=it</a>
_gid	Third Party: Google Analytics	<b>Analytics:</b> to store and count page views.	1 day	<a href="https://policies.google.com/privacy?hl=it">https://policies.google.com/privacy?hl=it</a>
__utma	Third Party: Google Analytics	<b>Analytics:</b> to store the number of your visits, the time of the first visit, the previous visit and the current visit.	2 years	<a href="https://policies.google.com/privacy?hl=it">https://policies.google.com/privacy?hl=it</a>
_ga_*	Third Party: Google Analytics	<b>Analytics:</b> to monitor and analyse traffic data and serve to track User behavior in order to improve the User experience.	2 years	<a href="https://policies.google.com/privacy?hl=it">https://policies.google.com/privacy?hl=it</a>

#### 4. Permission to use cookies

4.1 Upon first access to any page of the Site, there is a banner containing a brief notice with a link to this Cookie Policy; a "Accept" button to click if the User wishes to consent to the installation of all cookies other than technical ones, and a "Manage Cookies" button that allows the User, through a specific tool, to accept (or later deny) consent for all or, separately by moving the relevant sliders, for different functionalities, third parties, and categories of non-technical cookies. Technical cookies cannot be disabled as they are strictly necessary for the site's operation. Additionally, in the upper right corner of the banner, there will be a command marked with a cross, whose selection results in the default settings being applied, meaning

that no non-technical cookies are installed, and thus, navigation continues without cookies other than technical ones.

In the upper right corner of the banner, there is also a command marked by a cross, whose selection results in the default settings being maintained, so no non-technical cookies are installed, and thus navigation continues without cookies other than technical ones.

4.2 Closing the banner by clicking on the cross in the upper right corner of it, scrolling the page, or clicking anywhere on the page of the Site outside the banner does not constitute consent to the use of cookies other than technical ones.

4.3 The User can at any time access the "Manage cookies" tool to revoke/modify the consents given, by clicking on the button in the footer of any page of the site.

4.4 The Data Controller uses a technical cookie to store the User's preferences related to cookies.

4.5 Through the options provided by the navigation browser, it is always possible to set the browser so that cookies are stored on the device or can be refused, for example, based on a predefined setting or based on the relevant owners. Each browser has a different way to allow cookie management and choices, as described in the information pages of each browser. It is possible to disable cookies by following the instructions provided by the main browsers at the following links:

- Google Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=it>
- Apple Safari: <https://support.apple.com/it-it/guide/safari/manage-cookies-and-website-datasfri11471/mac>
- Mozilla Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>
- Microsoft Edge: <https://support.microsoft.com/it-it/microsoft-edge/eliminare-i-cookie-inmicrosoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae096>
- Microsoft Internet Explorer: <https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-deletemanage-cookies>

Please note that if you decide to disable technical cookies through the functions provided directly by the browsers, many of the website's functionalities may be lost and some services may not work as they should.

4.6 Further information is available at <http://www.youronlinechoices.com/it/le-tue-scelte/>, which brings together professionals from the digital advertising industry within the European Digital Advertising Alliance (EDAA). The companies associated with this platform allow the user to reject or accept through it the cookies they use to tailor the ads that may be displayed on their device to information about their browsing behaviour.

## **5. Purposes and legal basis for processing personal data**

5.1 Data collected through technical cookies will be processed for the purposes described above in point 2.4(a) with the functionalities described in the table in point 3.1, exclusively to allow the User to correctly use all the functionalities of the Site and the requested services; therefore, on the legal basis of executing a pre-contractual request or contractual execution.

5.2 Profiling cookies data are used for the purposes described above in point 2.4(b) with the functionalities described in the tables in point 3.2, only with the User's consent, which constitutes the legal basis for the related processing.

## **6. Nature of data provision**

6.1 Technical cookies are necessary to allow the User to use its functionalities and services; therefore, they are not subject to prior consent and cannot be disabled.

6.2 Conversely, profiling cookies are not strictly necessary to use the website and their installation is subject to the User's consent. Failure to consent to such cookies will not prevent the navigation and use of the website in any case.

## **7. Processing methods**

Users' personal data are processed with electronic and IT tools for the time strictly necessary to achieve the purposes mentioned above for which they were collected. They are processed in compliance with the applicable regulations, adopting the appropriate and most adequate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction.

## **8. Data recipients**

8.1 Users' personal data will be processed by the Data Controller's employees or collaborators, trained on processing, and by other responsible parties (service/assistance providers, consulting companies, data processing, and other IT services), and, based on the consent possibly given by the User, by the third parties listed in the tables in point 3 above.

8.2 Users' personal data may also be shared with other third parties where necessarily required by legal obligation.

## **9. Data Retention Period**

Cookies are stored on the User's terminal for the duration specified in the tables in sections 3.1 and 3.2 above.

## **10. User Rights**

10.1 As a data subject, you are entitled to the rights set forth in Articles 12 and following of EU Regulation 679/2016 (the "GDPR"), including the right to access your personal data. This means you can, among other things, obtain confirmation as to whether or not personal data concerning you is being processed. You have the right to request, in accordance with the law, the rectification or erasure of your data, or the restriction of its processing, to safeguard your rights. You also have the right to object to the processing of your personal data, and to revoke any consent given, using the "Manage Cookies" tool mentioned in section 4.3 above. Additionally, you have the right to receive the personal data you have provided to us in electronic format, either directly to yourself or to another entity you designate.

10.2 You can exercise these rights by sending a request to the following email address: [roma@nmlex.it](mailto:roma@nmlex.it).

10.3 Furthermore, you have the right to lodge a complaint with the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) if you believe that the processing of your data violates applicable regulations.

## **11. Changes to this Policy**

It may be necessary to make changes to this policy due to regulatory updates or to keep up with technological advancements. The Controller reserves the right to make

such changes, which will be communicated through pop-up notifications on the website or other appropriate means.