

DETAILED DISCLOSURE ON THE USE OF COOKIES

Pursuant to Regulation (EU) 2016/679 (hereinafter also the “Regulation”) and Italian legislation, in its capacity as “Data Controller” ARIA S.p.A. provides below a detailed disclosure concerning the cookies installed on the In-Lombardia website (hereinafter also the “Site”) with the aim of illustrating the types of cookies used, the way they are used, as well as providing indications on how to refuse or delete the cookies present.

1. What are cookies?

Cookies are small text files that web applications send to visitors for various purposes.

These can be classified according to a variety of criteria:

- the site that generates them: **first-party cookies**, set directly by the operator of the site visited, and **third-party cookies**, set by a website other than the one visited;
purposes of use: **technical cookies**, aimed at managing the technical aspects necessary to provide a service requested by the user (hereinafter also the “User” or “Users”, such as browsing a website, managing a User’s session or automatically recognising the User’s preferred language. Among these types of cookies, analytical, anonymised and aggregated cookies are also used in order to collect information on the number of Users and how they visit the website, and thus to compile general statistics on the service and its use.
First-party profiling cookies, used to analyse the browsing characteristics of Users and create profiles based on their site-based behaviour.
Third-party cookies, meaning cookies used by third-party services - managed directly by third parties and of which the Site Owner does not carry out any processing - which may also use profiling cookies.
- Duration: **permanent cookies** are stored in the device permanently, **temporary cookies** have a variable and limited duration and **session cookies**, disappear when the browser is closed or when the User logs out.

2. The cookies used on this Site and their purposes

2.1 Technical cookies do not require the consent of the User.

This Site uses technical cookies that are indispensable for the proper functioning of the Site and to enable efficient and safe browsing. These cookies are strictly necessary for the above-mentioned purposes and to enable the use of the content and services requested by the User. The prior consent of the User is not required for the installation of such cookies.

In addition, the Site uses analytical cookies through the Web Analytics Italia ([WAI](#)) information collection system in order to perform a statistical analysis of accesses or visits to the Site. These cookies can be equated with technical cookies because they are used directly and only by the Site Operator to collect significant information, in aggregate form, concerning, for example, how Users interface with telematic systems, i.e. which devices, operating systems or browsers are used to access them, the quality and usability of the sites themselves, assessable by simple indicators such as the quantity of visits, their duration, page loading speed or searches carried out by the User.

The information collected by this type of cookie is in a form that does not allow the User to be identified, since, as it is based on Matomo, WAI uses anonymisation of the User’s IP address by default. These cookies do not require the User’s prior consent in order to be installed and used. For further information on the processing of personal data by Web Analytics Italia, reference should be made to the [WAI](#) Privacy Policy.

2.2 Third-party cookies (require the consent of the User)

On this Site, subject to the expression of consent by the User, third-party services may be adopted - managed directly by third parties and which the Site Owner does not process - and may use profiling cookies. For instance, third-party cookies may be transmitted when viewing videos on a YouTube channel or other content embedded on the Site by external services (e.g. Facebook or Twitter social walls).

Specifically, and subject to consent, these cookies are used for displaying adverts on Facebook.

For further information on the processing of personal data, reference should be made to the Facebook's Privacy Policy <https://www.facebook.com/about/privacy/previous>.

Failure by the User to provide consent will preclude the possibility of using the additional content and functionality related to the installation of third party cookies.

3. Guidance on the handling of cookies by the User

When a User first access the Site, all first-party and/or third-party profiling cookies, if any, are blocked, while only the technical and functional cookies described above are active. In application of the provision of the Data Protection Authority titled "Guidelines cookies and other tracking tools" - 10 June 2021 [9677876] for the acquisition of consent for the use of cookies", Users of the Site can give their explicit consent to the installation of profiling cookies on their PCs via the banner that appears when they first log in. Users may at any time view the cookies for which they have granted permission and modify their preferences as necessary.

3.1 Disabling the use of cookies

Users can disable all cookies stored on their hard disk by accessing the appropriate section within their browser. Below are links to specific instructions for the main browsers in use:

- Edge: <https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d#ie=ie-9>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=it>
- Firefox: <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>
- Safari: <https://support.apple.com/it-it/guide/safari/sfri11471/mac>

3.2 Activating anonymous browsing mode

With this function, now available in all browsers, it is possible to surf the web without saving any information about the sites and pages visited.

However, it should be noted that, even when this functionality is activated, browsing data are recorded and stored by website operators and connectivity providers.

3.3 Deleting cookies directly

Currently, almost all browsers allow Users to delete the cookies installed.

For further instructions, Users should consult their browser guide or visit one of the following links:

- Edge: <https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d#ie=ie-9>
- Firefox: <https://support.mozilla.org/it/kb/Eliminare%20i%20cookie>
- Chrome: https://support.google.com/chrome/answer/95647?hl=it&ref_topic=3421433
- Safari: <http://support.apple.com/kb/HT1677>

However, with each new session, the cookies will be reinstalled. For this reason, Users are advised to perform this operation periodically or use automated functions for periodic deletion.

4. Data Controller

The Data Controller is ARIA S.p.A. with registered office in Via Torquato Taramelli 26, Milan (MI), 20124 - Italy.

5. Data Protection Officer (DPO)

The Data Protection Officer (DPO) can be contacted at rpd@ariaspa.it.

6. Scope of knowability and dissemination of data

Personal data will not be disseminated in any way.

For third-party cookies, operated directly by third parties, reference should be made to the Privacy Policy of the latter for further information on the processing of personal data.

7. Transfer of personal data to non-EU countries

Personal data collected are transferred outside the European Union in the manner permitted pursuant to Art. 44 et seq. of the Regulation.

8. Rights of the User

Pursuant to Articles 15-22 of the Regulation, the following rights may be asserted, where applicable:

- right of access to the data, by means of an appropriate request for the following information: purposes and methods of processing; categories of personal data concerned; recipients or categories of recipients to whom the personal data have been or will be communicated; period of data retention; logic applied to data processing; identification details of the Data Controller and Data Processors;
- right of rectification, by means of a request for supplementation/amendment of data;
- right of erasure, by means of a request for the deletion of data without undue delay, without prejudice to all retention obligations required under law;
- right to data portability, by means of a request to receive personal data in a structured, commonly used and readable format.

Requests for the exercise of rights should be sent to privacy@pec.ariaspa.it.

There is also the right under Art. 77 of the Regulation to lodge a complaint with the Data Protection Authority.