INFORMATION NOTICE IN COMPLIANCE WITH THE REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ("GDPR") – "COOKIE POLICY"



DATA CONTROLLER

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("Company" or "Data Controller")



PERSONAL DATA PROCESSED

Navigation Data.

COOKIE POLICY

WHAT ARE COOKIES

The so-called "cookies" are data created by a server and stored as text files in a computer's hard disk or in any device used by the user in order to access the Internet (smartphone, tablets, etc.). The cookies allow to collect information regarding the navigation performed by the user on a website.

The cookies can be permanently stored in your computer and have a variable duration (the so-called "persistent cookies"), but they can as well disappear when you close the browser or they can have a limited duration (the so-called "session cookies").

The cookies can be installed on your computer by the site you're visiting (the so-called "first party cookies") or they can be installed by other websites (the so-called "third party websites").

HOW WE USE COOKIES

1. Technical cookies



- session/navigation cookies: the use of the so-called "session cookies" (which do not get persistently stored in the user's computer and disappear once the browser is closed) is strictly limited to the transmission of session identifiers session IDs-(which are made of random numbers generated by the server itself). These Session IDs are necessary in order to allow a safe and efficient exploration of the site and of its applications. The so-called "session cookies" used in the Company's website make sure there is no need to use other information technologies, which may be potentially dangerous for the confidentiality of the user navigation. Moreover, session cookies do not allow the acquisition of the user's identifying personal data. Session cookies do not require your consent;
- b. <u>persistent cookies</u>: even after the user leaves the website, the persistent cookies remain stored in his or her hard drive until they get deleted or they expire. The Company's website itself creates this type of cookies and stores them on the device in order to be able to read them the moment the user returns to visit the website.
 - The purpose of persistent cookies is to collect identifying information about the user and allow him or her to find the same preferences previously settled (for example language, etc.) even when subsequently visiting the website.
- 2 Analytical Cookies: these cookies are installed in order to collect aggregate data mostly of statistical nature (e.g. how long you are staying on a page or how many visitors navigate the website);
- <u>first party analytical cookies</u>: they can be assimilated to the technical cookies as the website you're visiting in that moment directly stores them on the computer in order to improve the website's usability. Your consent for the first party analytical cookies is not required;
 - c. third party analytical cookies: they are created and installed by third parties in order to analyse the user's navigation path and subsequently create statistics about who visits the website. This allows to improve the offer of contents, show similar products and eventually create a targeted advertising. The system used is Google Analytics, which is a web service analytic system provided by Google LLC ("Google"). As well as the other systems, Google Analytics makes use of the cookies in order to allow the website to analyse how the users use the website. The information generated by the cookies about how the website is used will be transmitted to and deposited at the

Google servers in the United States. Google will use this information with the purpose to track and examine the usage which is being made of the website, fill in reports about the website's activities and provide other services regarding the Internet usage. Google might as well transfer this information to third parties only where this is allowed by the Law or where the third parties process such information on behalf of Google. Google will not associate the user IP address to any other data owned by Google. Anyway, the user can refuse to use the cookies by selecting the appropriate setting on his or her browser; however, this may prevent the user from using all of the website's functions. As the IP address is visible, the usage of third party analytical cookies necessitates your consent. By clicking on the button "Continue" placed on the banner or by continuing with the navigation on the Company's website, the user allows Google to process his or her Data for the above-listed purposes.

MANAGEMENT OF COOKIE PREFERENCES

The consent regarding the usage of cookies is given in one of the following ways:

- by clicking on the button "Continue" which you'll find on the banner containing a short Information Note, which appears when the user enters the website;
- by continuing the navigation on the Company's website accessing another area of the website or selecting an element of the same page.

HOW TO MODIFY THE COOKIE SETTINGS

The majority of the browsers are initially set in order to automatically accept the cookies. This means that, in any moment, the user has the possibility to set his or her browser in order to enable all of the cookies, enable only some, or disable them.

Moreover, the user can set the browser preferences in order to be advised whenever a cookie is stored on his or her computer. At the end of each navigation session the user can delete all of the cookies which have been stored from his or her hard drive. If he or she wants to delete the cookies stored in the cookie folder of the browser use, the user should know that each browser has different procedures to manage the settings. By clicking on the down-listed links the user can receive specific instructions for some of the main browsers:

Microsoft Windows Explorer: http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies

Google

Chrome: https://support.google.com/chrome/bin/answer.py?hl=en&answer=95647&p=cpn_cookies
Mozilla Firefox: http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies
Apple Safari: http://docs.info.apple.com/article.html?path=Safari/5.0/en/9277.html
If the user does not want to receive Google Analytics cookies, he or she can disable them by visiting the following page: https://tools.google.com/dlpage/gaoptout/

If the user wants to know more about cookies in general, he or she can visit the following page: http://www.allaboutcookies.org

If the user wants to know/learn more about behavioural advertising and online privacy, he or she can visit the following page: http://www.vouronlinechoices.com

If the user wants to know/learn more about Google Analytics cookies, he or she can visit the following page: http://www.google.com/intl/it/analytics/privacyoverview.html

If the user wants to learn more about the Criteo cookies used by our website, he or she can visit the following page: http://www.criteo.com/en/privacy-policy

Cookie	Name	Purpose	First/third party cookies	Legal basis	Term	Further information
Google Analytics	_ba	analytical	Third Party	Consent	2 years	Google's privacy policy and the modality of use of Google's cookies are available at the following links: https://www.google.com/intl/it/policies/privacy/https://www.google.com/intl/it/policies/technologies/ It's possible to download a Browser plug in in order to permanently oppose to Google Analytics cookies at the following link: https://tools.google.com/dlpage/gaoptout?hl=it
Google Analytics	_gat	analytical	Third Party	Consent	1 minute	
Google Analytics	_gid	analytical	Third Party	Consent	24 hours	



OBBLIGATORIETÀ DEL CONFERIMENTO DEI DATI

The personal data processed through the installation of technical and analytical first party cookies are necessary in order to grant a correct navigation.

It is optional to give consent for the installation of third party analytical cookies. Your personal data will be processed by installing such cookies only with your consent given in the above-listed ways.



RECIPIENTS OF PERSONAL DATA

The Data may be processed by organizations which operate as autonomous data controllers such as, by way of example, supervisory and control authorities and organs.

The Data may as well be processed, on behalf of the Company, by organizations designated as Data Processors, to whom the adequate operative instructions are given. Such subjects essentially belong to the following categories:

- a. companies that offer services of forwarding e-mails;
- b. companies that offer services required in order to pursue the aims indicated in this Information Notice (IT suppliers, a company which takes care of the management and maintenance of the website...).



PERSONNEL AUTHORIZED TO PROCESS PERSONAL DATA

Only the employees belonging to the deputed corporate functions will process the Data in order to pursue the above-stated purposes. Such employees have been expressly authorized and instructed to perform the data processing.

DATA TRANSFER TO EXTRA EU COUNTRIES



The Data collected by using the cookies may be transferred to the countries not belonging to the EU and particularly to the USA.

Google, including Google Inc. and the other US subsidiaries of its property, has certified his adhesion to the coherent principles of the Privacy Shield, for Google Analytics as well.

A copy of the Data may be obtained by contacting the Cavagna Group's Legal Department via e-mail at the following address: privacy@cavagnagroup.com

RIGHTS OF THE DATA SUBJECT – COMPLAINT WITH THE SUPERVISORY ACTIVITY



By contacting the Legal Department via e-mail at the following address: privacy@cavagnagroup.com, the data subjects have the right to access the Data processed by the Data Controller; furthermore they have the right to rectification and or integration of incomplete data, to erasure and also to restriction of processing in cases envisaged by art. 18 of GDPR. The data subjects can also exercise the right to oppose the processing on ground relating to his or her particular situation.

If the processing is based on consent or on a contract and is carried out by automated means, the data subjects have the right to receive the personal data concerning them, which they provided to a controller, in a structured, commonly used and machine-readable format. The data subjects also have the right to transmit the data to another controller without hindrance, if this is technically feasible.

In any moment the data subjects have the right to revoke the consent previously granted. For the above-stated purpose, the data subject who might prefer to be contacted exclusively via traditional means shall have the possibility to oppose only at the receipt of communications via automated means.

The data subjects have the right to lodge a complaint with the competent supervisory Authority.

Greengear Global S.r.l. uses analytical cookies as well as third parties' analytical cookies in order to monitor your behaviour on the website. If you click on "Accept" or continue the navigation accessing another area of the website or selecting an element of the same page, you authorize the use of cookies. Please click on the button "INFO" if you want to read the full information notice, choose which cookies authorize or deny consent.