

## **Cookie and Privacy Policy**

*This policy has come into force on 25 May 2018.*

Pursuant to Reg. EU 2016/679 (Personal data protection code), Comieco informs visitors that the personal data provided for registration to the website and for the purpose of delivering the services available through the website, will be processed in accordance with Reg. EU 2016/679 by Comieco. The complete policy in accordance with Reg. EU 2016/679 is published on the website. This policy provides information on our cookies and on the methods for protecting the privacy of visitors during use of our website.

### **1. Type of data processed / links to other websites**

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Comieco undertakes to respect your Privacy. Through this website, Comieco collects the personal data that you will decide to supply and information obtained through cookies, as better detailed below.

This website can also contain links to other Comieco websites or third-party websites, such as those of our partners, authorized installers and other affiliated companies, or to social media websites. When you click on a link to these other Comieco or third-party sites, please bear in mind that such sites have their own data privacy policies. Comieco shall not be liable for the websites of third parties.

### **2. Collection and use of information**

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If personal data is provided to Comieco, we will store and process this information for the purposes specified in our privacy policy (<http://garanteprivacy.it/web/guest/regolamentoue>).

In addition, in order to make our website more accessible to users in terms of system performance, usability and provision of useful information about our products and services, we will automatically store information on log files in your computer. These include the address of your Internet protocol (IP), browser type and language settings, operating system, Internet service provider (ISP) and date / time of registration.

We will use this information to manage our website efficiently, find out more about the behaviour of our users on the website, analyse trends and collect demographic data about our users as a group. The information collected can be used for our marketing and advertising services and our communications (e.g. to optimize and improve user experience by providing more attractive offers and special services), in compliance with current applicable laws.

Where non-personal information is used together with personal information, such information will be processed as personal data for as long as they remain associated.

### **3. Use of cookies**

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Our website, email messages, online service, advertising and interactive applications may use cookies to optimize our services.

#### **What is a cookie?**

A cookie is a small file, usually made up of letters and numbers which we send to the browser file that stores the cookies on the hard disk of your computer through our web server. For example, it allows our website to recognize a user's device once a connection is created between the web server and the web browser. The main purpose of a cookie is to enable our web server to present the user with customized web pages that make the visit to the COMIECO website more personal and relevant to each user's individual needs.

### **4. How does Comieco use cookies?**

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Comieco may use two types of cookies on this website:

- session cookies: these are temporary cookies stored in the cookie file of your browser until the end of your browser session. These cookies are required for certain applications or features to enable proper website functionality.
- persistent cookies: we can use persistent cookies to improve user experience (e.g. to offer optimized navigation). Persistent cookies remain in the cookie file of your browser for a longer period of time. The

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length of time will depend on the internet browser settings you have selected. Persistent cookies allow information to be transferred to a web server every time you visit the website. Persistent cookies are also referred to as tracking cookies. There are numerous online publications about cookies where you can find out more. See for example: <http://www.allaboutcookies.org>

### 5. Tracking and analysis

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For the purpose of continuous optimization of marketing-related communication, Comieco uses “Google Analytics” by Google Inc. This analytical software makes it possible to track online behaviour in terms of time, geolocation and website use. This information is collected via tracking pixels and / or cookies. The information obtained via tracking pixels and/or cookies is anonymous and will not be connected to personal data. All the information needed for this analysis is stored in servers located in Italy. Comieco will not share this information with third parties for independent use.

### 6. Enabling and disabling cookies and similar technologies

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Even after you consent to certain cookies, you will be able to withdraw your consent by changing the settings on your Internet browser.

For example, if you are using Explorer 8.0, you need to:

1. select tools and then Internet options
2. click on Privacy
3. use the cursor to choose the desired settings.

For other Internet browsers, please refer to your browser’s instructions for information on how to change your browser settings or delete cookies.

Please note that some features and full functionality of this website will not be available if cookies have been disabled.

### 7. Changes to this Policy

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Any future changes to this Policy will be posted on this page. We advise you regularly check our Policy for possible updates or changes.

### 8. Services used by this website

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- **Google Analytics statistics (Google)**

**Google Analytics**, is an analysis service provided by Google Inc. (“Google”) that uses cookies to collect the User's Personal Data, which are transmitted to and stored in Google servers in the United States. Google uses this information to track and analyze your use of the website, write reports on website activity for the website operators and provide other services related to website activity and use of the Internet. Google will not associate the user's IP address to any other data stored by Google. If you refuse the use of cookies by selecting the appropriate settings on your browser, you may not be able to use the full functionality of this Website.

- **Facebook social buttons/widgets (Facebook)**

Service managed by Facebook Inc, a company that complies with the Safe Harbor Privacy Policy Framework initiative, guaranteeing the processing of Personal Data in line with European security standards. The service allows users to interact with the social network through this website. When a user clicks, Facebook collects the data on the user’s visit to the website. Facebook does not share any

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information or data it holds with the website or with the data controller. For more information on the use of personal data by Facebook Inc., please use the link given below: <http://www.facebook.com/privacy/explanation.php>

- **Twitter social buttons/widgets (Twitter)**

Service managed by Twitter, a company that complies with the Safe Harbor Privacy Policy Framework initiative, guaranteeing the processing of Personal Data in line with European security standards. The service allows users to interact with the social network through this website. When a user clicks, Twitter collects the data on the user's visit to the website. Twitter does not share any information or data it holds with the website or with the data controller. For more information on the use of personal data by Twitter, please use the link given below: <http://twitter.com/privacy>

### **9. Optional nature of the provision of personal data**

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Apart from what was specified for browsing data, the user is free to choose whether to provide the personal data indicated in the electronic forms in the sections of this website related to special services offered upon request. Please note that failure to provide said data may make it impossible to obtain the service requested.

### **10. Processing methods and security measures**

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Personal data is processed using automated and manual instruments, and only for the time strictly necessary to attain the purposes for which the data was collected. Specific security measures have been deployed in order to prevent the loss of, unlawful or unfair use of, or unauthorised access to the data,

### **11. Rights of data subjects**

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The data subjects, whose personal data may have been collected through the above specific sections, have the right, at any time - pursuant to art. 11 et seq. of Reg. EU 2016/679 to access their data, to obtain erasure (right to be forgotten), anonymisation, as well as to object to processing for legitimate reasons, to restrict processing of their data, to obtain data portability, to obtain confirmation of the existence or otherwise of personal data concerning them and information as to their content and source, to verify accuracy or request integration, updating or rectification thereof. Requests must be sent to:

Comieco  
Milan offices: Via Pompeo Litta, 5 - 20122 Milan  
Tel. 02-55024.1 - Fax 02-54050240  
[privacy@comieco.org](mailto:privacy@comieco.org)

### **12. Under age persons**

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Comieco Via Pompeo Litta 5- 20122 Milano Tel. 02-55024.1 Fax 02-54050240 [privacy@comieco.org](mailto:privacy@comieco.org) does not knowingly use the website to collect data from users under the age of 18.

### **13. Versions of the privacy policy**

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In view of the fact that the current level of perfection of automatic control mechanisms does not make them free from errors and malfunctions, we wish to point out that this document is the "Privacy Policy" for the website of Comieco - Via Pompeo Litta, 5 - 20122 Milano Tel. 02-55024.1 Fax 02-54050240 [privacy@comieco.org](mailto:privacy@comieco.org) and it will be subject to updates (the various versions of the same will be made available).