

TRAENT COOKIES POLICY

Last Updated: February 20, 2023

Cookies Policy

The purpose of this Cookies Policy is to inform the user of the procedures followed for the collection, by means of cookies and/or other monitoring and tracking technologies, of the information the user provides when visiting the website <https://traent.com> ("Site").

For the purposes of this notice, the term "cookies" shall also refer to the other monitoring and tracking tools used by the Site, as better described below.

The following information is provided for the Site and not for other websites of third parties that may be consulted by the user through links.

This Cookie Policy should be read in addition to the Privacy Policy available at the following link https://traent.com/wp-content/uploads/2022/11/Traent-Privacy-Policy_EN.pdf, to which please refer for any other information on the processing of personal data.

The Data Controller is with its registered offices at Viale Coni Zugna, 71, Milano (20144), Italy, and operational offices at Borgo Stretto, 3, Pisa (50127), VAT number 11036710967.

Browsing data, cookies, and other tracking tools

Browsing data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected in order to be associated with identified persons, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users who connect to the Site, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

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This data is used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to check its correct functioning and is deleted immediately after processing.

The data could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the Site: except in this case, the data are retained for the time defined by the relevant legal regulations or, in general, for the time strictly necessary to provide the user with the requested service and to guarantee the transmission of the communication.

Cookies

Cookies are generally strings of text that websites (so-called publishers or "first parties") visited by the user or different websites or web servers (so-called "third parties") place and store – directly, in the case of publishers, and indirectly, i.e. through them, in the case of "third parties" – in a terminal device available to the user. The terminals referred to are, for example, a personal computer, a tablet, a smartphone, or any other device capable of storing information.

The software for surfing the Internet and operating these devices, e.g. browsers, can store cookies and then transmit them back to the sites that generated them on the occasion of a subsequent visit by the same user, thus keeping a record of his/her previous interaction with one or more websites.

The information encoded in cookies may include personal data, such as an IP address, user name, unique identifier, or email address, but may also contain non-personal data, such as language settings or information about the type of device a person is using to browse the site.

Cookies can therefore perform a wide variety of important functions, including performing computer authentication, session tracking, storing information on specific configurations of users accessing the server, and facilitating the enjoyment of online content. They can, for example, be used to keep track of the items in an online shopping cart or the information used to fill in a computer form. So-called 'authentication' cookies are of particular importance whenever it is necessary to verify who is accessing certain services, such as banking services. If, on the one hand, it is through cookies that it is possible, among other things, to allow web pages to load more quickly, as well as to route information over a network – in line, therefore, with obligations strictly related to the very operation of websites –, again through cookies it is also possible to convey behavioral advertising and then measure the effectiveness of the advertising message.

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The same result achieved by cookies can also be achieved through the use of other tracking tools (so-called 'active identifiers' and 'passive identifiers', the latter assuming mere observation), which allow processing operations similar to those indicated above.

Types of cookies

Cookies and other tracking tools may differ in terms of their duration (session or permanent), or subjectively (depending on whether the publisher acts independently or on behalf of the "third-party"). However, the classification that mainly meets the user's protection needs is the one based on two macro-categories:

1. **technical cookies**, used for the sole purpose of "carrying out the transmission of a communication over an electronic communication network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the contracting party or user to provide such service" (see Article 122, paragraph 1 of the Privacy Code); these cookies may be installed on the user's terminal without the user's consent, based, as the case may be, on the need to fulfill a request by the user or on the legitimate interest of the Company.
2. **profiling cookies**, used to link specific actions or behavioral patterns recurring in the use of the offered functionalities (pattern) to specific, identified, or identifiable subjects, in order to group the different profiles within homogeneous clusters of different sizes, so that it is possible to send increasingly targeted advertising messages, i.e. in line with the preferences expressed by the user while surfing the web; this type of cookie may be downloaded to the user's terminal only with the latter's consent.

Cookies may also be used to assess the effectiveness of an information society service provided by a publisher, for the design of a website, or to help measure its 'traffic', i.e. the number of visitors also possibly broken down by geographic area, time of connection, or other characteristics. These identifiers, defined as analytics cookies, may be included in the category of technical cookies, and as such, may be used in the absence of the prior acquisition of the consent of the data subject, if the following conditions occur:

1. they are only used to produce aggregate statistics and in relation to a single site or mobile application;
2. at least the fourth component of the IP address is masked for those of third parties;
3. third parties refrain from combining such analytics cookies with other processing (customer files or statistics of visits to other sites, for example) or passing them on to third parties.

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If these conditions are not met, analytics cookies also require the user's consent in order to be downloaded.

Finally, cookies may also be used to enable interaction and easy sharing of content on social networks and/or to enable the sending of targeted advertisements based on the user's preferences (social cookies); such cookies also require the user's consent.

Like cookies, **other tracking tools** can be categorized according to a number of different criteria, the main one being, however, the purpose for which they are used: technical or commercial.

Changing cookie settings

The user may object to the recording of cookies on their hard disk by configuring their browser to disable cookies. The methods offered by the main browsers are described below:

1. Internet Explorer: <https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>
2. Chrome: <https://support.google.com/chrome/answer/95647?hl=it>
3. Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
4. Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
5. Safari: http://support.apple.com/kb/HT1677?viewlocale=it_IT

After completing this operation, however, some functions of the web pages may not be executed correctly.

The user can also disable cookies from Google Analytics by downloading a specific browser plug-in available at the following URL: <https://tools.google.com/dlpage/gaoptout>.

List of cookies used by the Site

This Site uses cookies for technical purposes, for analysis, and statistical purposes, to improve user interactivity with the Site via social networks and to customize the sending of information and advertising communications according to the user's interests (profiling).

Technical cookies

1. Webflow
2. Google reCAPTCHA
3. Google Tag Manager
4. Google Fonts

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5. Google Analytics
6. Font Awesome

The installation of technical cookies does not require the prior consent of users. However, all browsers allow user to change cookie settings. User can usually find these settings in the "options" or "preferences" menu of his browser. Or user can use the 'Help' option in his browser for more information.

Data protection rights

Every user has the right to obtain from the Company, subject to the existence of the legal prerequisite underlying the request

1. access to and rectification of personal data concerning him/her;
2. the deletion of personal data
3. the rectification of personal data held by the Company
4. revocation of consent in cases where processing is based on consent
5. the restriction of the processing of personal data;
6. the copy of personal data provided by users to the Company, in a structured, commonly used, and machine-readable format (portability) and the transmission of such personal data to another data controller.

Right to object: in addition to the rights listed above, the user always has the right to object at any time, for reasons related to his/her particular situation, to the processing of his/her personal data carried out by the Company in pursuit of its legitimate interest and to the processing of his/her personal data for marketing purposes.

In the event that the user exercises any of the aforementioned rights, it will be the Company's responsibility to verify that he/she is entitled to exercise them and will be acknowledged, as a rule, within one month.

In the event that the user considers that the processing of his or her personal data takes place in violation of the provisions of the applicable legislation on the protection of personal data, he or she has the right to lodge a complaint with the Guarantor for the protection of personal data, using the references available on the website <https://www.garanteprivacy.it/>, or to take legal action.

Contact

If a user has questions about this Cookie Policy, they can contact Traent by visiting this page on our website: <http://www.traent.com>.

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