COOKIE POLICY

Introduction

This Cookie Policy is drafted and provided in supplementation of the privacy policy already provided and published on the website www.in-lombardia.it ("**Website**") in accordance with Art. 13 of Italian Legislative Decree no. 196/2003, *Personal Data Protection Code*, and is rendered also in conformity with the provisions indicated in the Measure of the Data Protection Authority dated 8 May 2014 concerning "*Identification of simplified methods for the privacy policy and acquisition of consent for use of cookies*" as amended and supplemented.

The processing controller is Explora S.c.p.a., with registered office in Milan (Italy), Via Fabio Filzi, 22, VAT number 08344310969.

The Website user ("**User**") is strongly advised to consult this document frequently, so as to be aware of any variations or modifications made to the same mainly as a result of regulatory changes.

Cookies and browsing data

With reference to internet browsing, the Website uses cookies to make its services simple and efficient for Users who visit and use the pages of the Website itself.

Cookies are data files of small dimensions, often containing an anonymous identification code, that are sent by a Web server to the User's browser and may be subsequently stored on the hard disk of the User's computer.
The cookie is then re-read and recognised by the Website which sent it each time a subsequent connection is made. Cookies contain information that allows the User's browsing preferences to be stored and thus to personalise a website according to the User's requirements.

Cookies may, for example, make use of the Website more immediate and/or enable certain functions. For example, cookies may make it possible to avoid re-entering the same information several times during the visit such as, for example, User Name and password for the Account.
Cookies collected by the Controller by way of Website browsing consist exclusively of so-called technical cookies, required to permit secure and efficient browsing of the Website and to use its respective functions and tools.

The Controller may use cookies for statistical purposes in relation to use of the services available via the Website and with the aim of improving its use by the Users. In this case, cookies will be used exclusively in anonymous form.

Type of cookies used by the Website

Below are the types of cookies used by the Website, grouping them based upon the purposes for which they are used.

Technical cookies
This type of cookie enables the correct functioning of some sections of the Website and allows the User to browse on the Website and to use its functions. Technical cookies may be of two categories:
• persistent: once the browser is closed, they are not deleted, but persist for up to a maximum of 23 days;

• session: they are deleted automatically each time the browser is closed.

These cookies are functional to viewing the Website correctly and in relation to the technical services offered; they will therefore always be used and sent (unless Users modify the settings on their browsers).

This category includes cookies that allow, when registered Users are browsing, for the session to be saved or for the session information to be stored for a limited time so as to allow for a further access to the Website without having to enter the user name and password again.

This website uses technical cookies to memorise Users' browsing preferences and to optimise their experience. These cookies include, for example, those used to track any acceptance of this cookie policy ("useCookie") or the fact that the browser used has "javascript" enabled.

<u>Analytics cookies</u>

The cookies of this category are used to collect information on Website use.

The Website uses this information to obtain anonymous statistical analyses in order to improve its use and to make the contents more aligned to the wishes of visitors. This type of cookie collects data in anonymous form on the User's activity and on how they reached the Website.

Analytics cookies are sent by the Website itself (known as "first-party" cookies) or by domains / websites of third parties (known as "third-party" cookies).

The Website uses, as third-party cookies, the following Google Analytics cookies:

Cookie	Function	Duration
_ga	It is used to distinguish users	2 years after creation or update
_gid	It is used to distinguish users	24 hours after creation or update
_gat	It is used to block the number of requests of analysis scripts so as to consider users' visits unique	10 minutes after creation or update

For Google Analytics cookies, the pseudonymisation of the User's IP address has been activated which is not, therefore, tracked.

User's Consent

The Controller, according to existing regulations, is not required to request consent from the User in relation to the use of first-party technical cookies, as they are necessary to provide the services requested by browsing on the Website. The latter, as a consequence, are installed automatically by the Website, at the first visit by the User, subject to the possibility for the latter to disable them as indicated in the paragraph below.

For all other types of cookie, the consent of the User is requested by way of a banner which immediately appears on the Website: consent is provided by active conduct by the User by both clicking on the specific icon "OK" and by clicking outside the banner or by continuing to browse.

Users can also manifest and/or modify their preferences by accessing and modifying the settings of the browser used to navigate on the Website (as indicated in the paragraph below) or by modifying the settings in using the services of third parties (in that regard, see the paragraph "Management of cookies by access to third party websites").

Commentato [PPZ&A1]: Check if this is coherent with the banner text.

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How to manage Cookies via the browser settings

Almost all browsers for the internet are set to accept cookies automatically. Users can modify the set configuration and disable cookies, setting the desired level of protection. In any case, Users can also delete individual cookies from their computers, by selecting, again from the item "Internet Options" of the Tools menu, the "General" option and clicking on the delete button.

Below are some more detailed instructions for Users to manage cookies for the most popular browsers. To delete cookies from the Internet browser of your smartphone/tablet, please refer to the device's user manual.

Chrome
1. Click on the menu at the top right ≡ of the browser toolbar.
2. Select *"Settings"*.
3. Click on *"Show Advanced Settings"*(link at the bottom of the list).
4. In the *"Privacy"* section click on *"Content settings"*.
5. In the *"Cookies"* section, you can change the following Cookie settings:
   - Allow data to be saved locally
   - Store local data only until the browser is closed
   - Prevent websites from setting Cookies
   - Block third-party cookies and website data

   as well as manage exceptions for some internet websites and delete one or all cookies.

Mozilla Firefox
1. Click on the menu at the top right ≡ of the browser toolbar
2. Select *"Options"*
3. Select the *"Privacy"* panel (on the left side of the page)
4. In the *"Tracking"* section you can change the following settings relating to Cookies:
   - Communicate to the websites visited the desire not to be tracked
   - Activate anti-track protection in anonymous browsing mode
5. From the *"History"* section you can:
   - Delete the recent history,
   - Remove individual cookies.

Internet Explorer
1. Click on the *"Tools"* button in the top bar of the browser and select *"Internet Options"*
2. Click on the *"Privacy"* tab and in the *"Settings"* section, change the slider according to the desired action for Cookies:
   - Block all Cookies
   - Allow all Cookies
   - Select websites from which to obtain Cookies

Safari
1. Click on *"Safari"*, select *"Preferences"* and click *"Privacy"*
2. In the *"Block Cookies"* section specify how Safari must accept Cookies from Internet websites.
3. To view which websites have stored Cookies click on *"Details"*

We recommend, in any case, that Users check, from time to time, also the instructions of their browsers.

Commentato [DI2]: To be checked and where necessary updated.

Commentato [PPZ&A3]: To be checked that they are correct.

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How to manage cookies by modifying the settings in using services of third parties

As indicated in the above paragraphs, the Website may contain third-party cookies and links to other websites: the third parties have their own privacy policy which differs from that adopted by the Website and with respect to which Explora is entirely extraneous and free from liability.
Set out below is the link to the page containing third party information and specific instructions.
• Google Analytics Services: https://www.google.com/intl/it_it/policies/technologies/cookies/ - https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=it
Users are advised to read carefully the privacy policies on the use of cookies prepared by third parties as cited above also with the aim of becoming aware of any changes made to the same by the respective provider, independently from Explora.

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In the case of discrepancies between the contents of this Policy and what is indicated in the general terms published on the Website and/or in specific contracts entered into with Explora, the contents of the latter documents will prevail.

This Policy is subject to Italian law.

**BANNER CONTAINING SIMPLIFIED INFORMATION
to be published on the website home page**

This website uses cookies for its functioning and to offer a better browsing experience. Technical cookies and cookies used for statistical purposes have already been set. For further details on cookies, including third-party analytics cookies used by this website, and on how to manage their settings and deny consent, consult the Cookie Policy. By clicking OK, you consent to the use of cookies.

Commentato [PPZ&A4]: Enter link to full privacy policy.

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