# Cookie Policy of REWORLD MEDIA ITALIA S.R.L.

# A. A. Who are we and why are we providing this document?

Reworld Media Italia SRL, a company of Reworld Media Group (hereinafter "Reworld Media Group"), considers of crucial importance the protection of his actual and/or potential clients and users personal data guaranteeing that their processing, carried out by any means, automated or manual, fully respects the safeguards and rights recognized by the European Parliament and Council Regulation 2016/679, of April 27th 2016, relative to protection of natural persons with regard to Personal Data Processing, as well as to the free movement of such data (hereinafter the "Regulation"), and by any further applicable rules in the matter of protection of personal data.

The term "personal data" refers to the definition contained in article 4, point 1 of the Regulation, namely "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person" (hereinafter "Personal Data").

The Regulation foresees that, before processing Personal Data – where this term, according to its definition contained in article 4, point 2 of the Regulation, should be intended as "any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction" (hereinafter the "Processing") – it is necessary for the person, owner of such Personal Data, in this case you as user/visitor (hereinafter the "User") of this website (hereinafter "Website") and/or mobile app (hereinafter "Mobile App"), to be informed of the reasons why such data are been requested and how they will be used.

In this regard, this document aims to provide you, in a simple and intuitive way, with all useful and appropriate information so that you can be consciously informed of the use and processing of your Personal Data carried out by Cookies as later defined and used by this Website.

The extended information about the use of Cookies and other similar technologies (so-called **Cookie Policy**) has been, then, drawn up according to the principle of transparency and to all elements requested by article 13 of the Regulation and has been divided into single sections (hereinafter "**Sections**" and singularly "**Section**"), each of which deals with a specific topic to make your reading more simple and easy to understand.

#### B. What are Cookies?

Cookies are text strings made up of chunks of code sent by a web server (for example, a site) to an Internet browser and installed on it. In particular, they are small text files that the websites visited by users send to their terminals, where they are stored and then sent back to the same sites on the occasion of a subsequent visit. Almost all browsers are set up to allow the automatic storage of Cookies on the User terminal.

Cookies are used for various purposes, they have different peculiarities and can be used both by the Processing Owner, by the Processing Co-owners, as identified and defined in the following, as well as by third parties who use or can use on the Website, even in combination between them, the following

cookies categories, divided in accordance with the classification proposed in Opinion 04/2012 relative to exemption from consent for the use of cookies published by the Working Party article 29 within the EU (available here):

#### Session or permanent Cookies

Cookies can expire at the end of the browser session (the period of time between the user opening of a browser window and its closing) or can be stored for a longer period. Session Cookies are those who allow websites to link the user actions during a browser session. Session Cookies expire when the browser session ends. Permanent Cookies are stored on the user device between browser sessions, for variable periods of time, and facilitate the storage of Users preferences or actions in relation to a website.

#### **Technical or profiling Cookies**

Technical Cookies are those used by the Owner of a website for the sole purpose of transmitting a message via a electronic communication network, or as is strictly necessary for a service provider of the information society to provide the service the subscriber or user has explicitly requested. For the installation of this Cookies the prior consent of the Users is not required, wherever used directly by the site manager. Profiling Cookies are designed to create user-related profiles and are used to send advertising messages in line with the preferences expressed by the User while navigating. Given the considerable invasive nature that this Cookies can have in regard to the Users privacy, the European and Italian Legislation foresees that the User should be adequately informed on their use through a short policy (banner) and a extended one on the site, and that he must express his consent the first time he visits the site. Such consent can be expressed in general, by interacting with the short policy banner on the landing page of the site, in the manner indicated on that banner, or it can be provided or denied in a selective manner, following the procedures described below. This consent shall be tracked on the occasion of subsequent visits. However, the User has always the option to withdraw all or part of the consent already expressed.

#### First or third party Cookies

A Cookie is "of first party" (so-called first party cookie) or "of third party" (third party cookie) depending on the website or the domain it comes from.

First party Cookies are, basically, those set and/or managed by the site owner. For these Cookies the obligation to provide information, obtain the consent and/or allow the possible blocking of Cookies shall rest with the owner of the site. Third party Cookies are those set by a domain other than the one being visited by the User. For these Cookies, the obligation to provide information and to describe the method for consenting or blocking Cookies lies with the third party, while the owner of the site is only obliged to insert on his site a link to the third party site where those elements are available.

#### C. Other technologies similar to Cookies used in mobile apps

The Processing Owner, Co-owners and third parties can use, especially for mobile apps, technologies similar to Cookies and aimed at information storage and recovery relative to your device and his use. Those activities can be carried out using:

• Pixel Tag or Web Beacon

A Pixel Tag (known as "web beacon" or "tracking pixel") is a smaller transparent graphic file (usually 1 pixel x 1 pixel) that is embedded in a web page, in combination with a Cookie, or within a mobile app and allows the collection of information related to the use of the web page and/or mobile app which contains the tracking pixel. The pixel tags can be used for different purposes, such as, including but not limited to, analyzing the use of websites and/or mobile apps, controlling and reporting on advertisement, and personalizing ads and contents.

Mobile device identifiers and SDK

A SDK mobile is a pixel tag or web beacon version (aforementioned) only for mobile applications. A SDK is a chunk of code that developers can include in mobile apps to allow displaying ads, collecting data and implementing related services. This technology is used to provide you, through mobile apps and browsers, with specific ads and features based on insights associated to your device or tablet. Some of the services listed below in accordance with the feature offered to the Users, focused on the use of third party SDK, could require no User consent. Besides, those third parties could – in addition to what is specified in this Cookie Policy and also unbeknownst to the Processing Owner and/or the Co-owners – make further tracking activities on the User. For detailed information on the matter, please consult the respective privacy policies of the listed services, where you may receive all information regarding data processing and consent withdrawal.

**Jointag.** The purpose of JoinTag services is to offer personalized ads to editors Users (through their websites and/or mobile apps), and to be a technological support for any other third party intending to offer the same services ("JoinTag partners"). JoinTag and his partners use identifiers to identify users and provide targeted ads based on their behaviour and/or movements. In order to have more information, or disable JoinTag or his partners services, please click here or write to <a href="mailto:privacy@jointag.com">privacy@jointag.com</a>.

**Nielsen Measurement.** Nielsen measurement system allows to collect app usage statistics in order to know the clients' interests and behaviours better. The service is enabled by default. In case the User want to deactivate Nielsen measurement, he may proceed enabling the option "Limit Ad Tracking" (IOS devices) and "Opt-out of ads personalization" (Android). If the application is installed on more than one device, the setting should be modified for each one of them. (Read Nielsen Privacy Policy: https://www.nielsen.com/it/it/legal/privacy-statement/digital-measurement/).

Marfeel.We/our partners may store and/or access information on a device (e.g cookies) and process personal data (eg. IP Address) for personalized ads display and content, ad and content measurement, audience insights, product development and creating a personalized ads profile. You can object to this or change choices (e.g. withdraw consent) at any time by clicking the "More options" button or "Manage your cookies" in the website's main menu. For certain purposes we may use precise geolocation data and/or actively scan device characteristics for identification.

**Notifiche push**. Using the mobile app, you can choose whether to receive from the Processing Owner push notifications on your mobile device or tablet, by accepting this service during the mobile app configuration. If at a later time you should decide to no longer receive push notifications, you may disable them using your mobile device and/or the same mobile app setting features.

#### D. Who will process your Personal Data?

The Processing Owner, according to its definition contained in article 4, point 7 of the Regulation, "natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data" is:

**REWORLD MEDIA ITALIA S.R.L.**, with registered Office in <u>Via Fantoli, 7, 20138 Milano. Via Bianca di Savoia 12, 20122 Milan</u>, Italy, recorded on the Milan Company Register, Tax code and VAT number n. 12693020963

(hereinafter the "Processing Owner")

#### E. Who can you contact?

The Processing Owner can be contacted through the following channels:

by writing to Reworld Media Privacy representative at <u>Via Fantoli,7, 20138 Milano Via Bianca di Savoia 12, 20122 Milan, Italy ;</u>

- by writing an email to <u>dpo.italy@reworldmedia.com</u> to the attention of Reworld Media Privacy Representative;
- by calling the telephone number [TO BE COMPLETED] and asking for Reworld Media Privacy Representative.

# F. What purposes will your personal data processed for and which Cookies will be used?

Within this Section you can find all information about Cookies installed through the Website.

Technical Cookies can be divided in the following subcategories:

- navigation cookies, through which navigation preferences can be saved and the user navigation experience possibly optimized;
- analytics cookies, even of third party, through which statistical information are acquired regarding navigation modes of the users. Such information are treated in an aggregated and anonymous way:
- functionality cookies, even of third party, used to activate specific features of the Website and necessary to provide the service or improve it.

Such Cookies, as specified within Section B of this Cookie Policy, being technical in nature, don't need your prior consent to be installed and used and their use will be legally based on the legitimate interest of the Processing Owner.

Profiling Cookies , in different forms of advertising, have profiling and commercial purposes, customised according to your interests and your behaviour. Their use will need your consent which will provide the processing legal base.

Some of the services listed below, in accordance with the feature offered to the Users, focusing on the use of third party cookies, could require no User consent. Such third parties, moreover, could – in addition to what is specified in this Cookie Policy and also unbeknownst to the Processing Owner – make further tracking activities on the User. For detailed information on the matter, please consult the respective privacy policies of the listed services, where you may receive all information regarding data processing and consent withdrawal.

## Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any optout feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

# Adform (Adform A/S)

Adform is an advertising service provided by Adform A/S. Personal Data processed: Cookies and Usage Data. Place of processing: Denmark – Privacy Policy – Opt Out.

#### Amazon Mobile Ads (Amazon)

Amazon Mobile Ads is an advertising service provided by Amazon.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy.

#### AppNexus (AppNexus Inc.)

AppNexus is an advertising service provided by AppNexus Inc.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt out.

#### belboon (belboon GmbH)

Belboon is an advertising service provided by belboon GmbH.

Personal Data processed: Cookies and Usage Data.

Place of processing: Germany - Privacy Policy.

#### Clickpoint (CLICKPOINT MARKETING SLU.)

Clickpoint is an advertising service provided by CLICKPOINT MARKETING SLU.

Personal Data processed: Cookies and Usage Data.

Place of processing: Spain - Privacy Policy.

#### Criteo (Criteo SA)

Criteo is an advertising service provided by Criteo SA.

Personal Data processed: Cookies and Usage Data.

Place of processing: France - Privacy Policy - Opt Out.

#### DotAndMedia (DotAndMedia S.r.l.)

DotAndMedia is an advertising service provided by DotAndMedia S.r.l.

Personal Data processed: Cookies and Usage Data.

Place of processing: Italy - Privacy Policy.

#### FreeWheel (Freewheel Media Inc (Comcast International France SAS))

FreeWheel is an advertising service provided by Freewheel Media Inc (Comcast International France SAS).

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt out.

#### Google AdSense (Google Ireland Limited)

Google AdSense is an advertising service provided by Google Ireland Limited. This service uses the "DoubleClick" Cookie, which tracks use of this Application and User behavior concerning ads, and services

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

In order to understand Google's use of data, consult Google's partner policy.

Personal Data processed: Cookies and Usage Data

Place of processing: Ireland - Privacy Policy - Opt Out.

#### OpenX Ad Exchange (OpenX Technologies, Inc.)

OpenX Ad Exchange is an advertising service provided by OpenX Technologies, Inc.

The service provides an ad exchange platform that facilitates the optimization of ads from

multiple ad networks, which can be third parties to both OpenX and the Owner.

Personal Data processed: Cookies and Usage Data. Place of processing: United States - Privacy Policy - Opt Out.

# Outbrain (Outbrain Inc.)

Outbrain is an advertising service provided by Outbrain Inc. Personal Data processed: Cookies and various types of Data as specified in the privacy policy of

Place of processing: United States - Privacy Policy - Opt Out.

#### PubMatic (PubMatic, Inc.)

PubMatic is an advertising service provided by PubMatic, Inc.

Personal Data processed: Cookies and Usage Data

Place of processing: United States - Privacy Policy - Opt Out.

# Rubicon Project (The Rubicon Project, Inc.)

Rubicon Project is an advertising service provided by The Rubicon Project, Inc.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out.

#### Simpli.fi (SIMPLIFI HOLDINGS, INC.)

Simpli.fi is an advertising service provided by SIMPLIFI HOLDINGS, INC.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out.

Smart AdServer (Smart AdServer SAS)

Smart AdServer is an advertising service provided by Smart AdServer SA.

Personal Data processed: Cookies and Usage Data.

Place of processing: France - Privacy Policy - Opt Out.

Teads (Teads SA)

Teads is an advertising service provided by Teads SA.

Personal Data processed: Cookies and Usage Data.

Place of processing: Luxembourg - Privacy Policy - Opt out.

Tradedoubler (Tradedoubler)

Tradedoubler is an advertising service provided by TradeDoubler AG.

For more information on the use of TradeDoubler Cookies and how to block them, please

visit: Tradedoubler's targeting technologies.

Personal Data processed: Cookies and Usage Data.

Place of processing: Sweden - Privacy Policy - Opt Out.

Webgains (Webgains Ltd (ad pepper media GmbH))

Webgains is an advertising service provided by Webgains Ltd.

Personal Data processed: Cookies and Usage Data

Place of processing: United Kingdom – Privacy Policy – Opt out.

Yahoo App Publishing Advertising (Oath Inc.)

Yahoo App Publishing is an advertising service provided by Yahoo! Inc.

If the User chooses to opt-out, Yahoo App Publishing will stop tracking data for the device

identified by the provided MAC address and/or device identifier going forward.

Yahoo App Publishing will stop providing ads and/or recommendations to that MAC address

and/or device identifier across all publishers.

Personal Data processed: Cookies and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out.

Zanox (Zanox)

Zanox is an advertising service provided by ZANOX.de AG.

Personal Data processed: Cookies and Usage Data.

Place of processing: Germany – Privacy Policy.

Permutive (Permutive Ltd.)

Permutive is an advertising service provided by Permutive Ltd.

Personal Data processed: Trackers and Usage Data.

Place of processing: United Kingdom - Privacy Policy - Opt out.

Permutive Technologies (Permutive Technologies, Inc.)

Permutive Technologies is an advertising service provided by Permutive Technologies, Inc.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt out.

- Advertising serving infrastructure
- Analytics
- Commercial affiliation
- Content commenting
- Displaying content from external platforms
- Heat mapping and session recording
- Hosting and backend infrastructure
- Interaction with data collection platforms and other third parties
- Interaction with external social networks and platforms
- Interaction with online survey platforms
- Remarketing and behavioral targeting

Commenté [CM1]: It is still relevant ?

Traffic optimization and distribution

# G. How can I manage the installation of Cookies?

In addition to what indicated within this Cookie Policy, you'll be able to manage your Cookie preferences directly within your browser and prevent, for example, third parties from installing any. Moreover, the browser preferences allow you to delete Cookies installed in the past, including a Cookie that has possibly saved the consent to install Cookies from this Website. It should be noted that after disabling all Cookies, the functioning of this Website may be compromised. You can find information about how to manage Cookies on your browser at the following addresses: Google Chrome, Mozilla Firefox, Apple Safari and Microsoft Windows Explorer.

In case of services provided by third parties, you can also exercise your right to object to the processing by checking the third party privacy policy, by using the opt-out link, if explicitly provided by such Cookie Policy, or by navigating directly within the third party privacy policy.

Notwithstanding the foregoing, we inform you that you may also make use of the Your Online Choices tool. This service allow you to manage the tracking preferences for most advertising tools. We suggest you to use it in addition to all others indicated within this Cookie Policy.

Given that the installation of Cookies and other tracking systems operated by third parties through services used within this Website cannot be technically controlled by the Processing Owner, each specific reference to Cookies and tracking systems installed by third parties is to be considered indicative. To get full information, please check the third parties privacy policy as indicated within this Cookie Policy.

Given the objective complexity of identification of technologies based on Cookies and their tight integration with the functioning of the website, please contact us using the contact channels within Section I if you want to receive any further information about the use of this Cookies and their possible usage – for example by any third party – made through this Website.

# H. How long will your Personal Data be processed?

One of the principles applicable to your Personal Data Processing concerns the limitation of the retention period, governed by Article 5, paragraph 1, point e) of the Regulation that reads "Personal Data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject".

In light of this principle, your Personal Data will be processed by the Processing Owner only for what is necessary to fulfil the stated purpose of this Cookie Policy. In particular, your Personal Data will be stored for the minimum necessary period of time, as mentioned in Recital 39 of the Regulation, namely until your objection to the Processing and/or withdrawal of consent, where required.

# I. Is it possible to withdraw the given consent and how?

As provided for by the Regulation, if you have given your consent to the Processing of your Personal Data, you can withdraw it fully and/or in part at any time without prejudice to the legality of the Processing based on the consent given before the withdrawal.

The opt out methods are very simple and intuitive, simply contact the Processing Owner and/or each third party, as indicated within Section E.

**Commenté [CM2]:** We can click on a link on the website which direct to further details regarding the cookies dropped for each category. It is still relevant?

# J. What are your rights?

As foreseen by Article 15 of the Regulation, you can access to your Personal Data, request their rectification and updating, if incomplete or erroneous, request their cancellation if data collection has taken place in violation of a law or regulation, as well as object to the Processing for lawful and specific reasons.

In particular, please find below all the rights you can exercise, at any time, against the Processing Owner.

Right to access: in accordance with article 15, paragraph 1 of the Regulation, you'll have the right to obtain from the Processing Owner confirmation as to whether or not your data is currently being processed and in that case, to obtain access to that Personal Data and to the following information: a) Processing purposes; b) categories of Personal Data concerned; c) Recipients and recipients categories to whom your Personal Data have been or will be communicated, in particular if they are from third countries or international organisations; d) whenever possible, the expected period of storage of Personal Data or, if it's not possible, the criteria used to determine that period; e) the existence of the Data Subject right to request from the Processing Owner the rectification or cancellation of Personal Data, or to limit the processing of Personal Data that concerns him, or to object to their processing; f) the right to lodge a complaint to a control authority; g) if data are not provided by the Data Subject, all information available on their origin; h) the existence of an authorized decision-making process, including profiling referred to in article 22, paragraph 1 and 4, of the Regulation and, in some case at least, significant information on the type of logic used, as well as the importance and consequences of the Processing concerned for the Data Subject.

You can find all this information within this Policy, that will be always available for you within the Privacy section of each of the Websites.

- Right to rectification: in accordance with article 16 of the Regulation, you can obtain the rectification of inaccurate Personal Data. Taking into account the purposes of the processing, you can also obtain the integration of incomplete Personal Data, also by providing an additional declaration.
- Right to cancellation: in accordance with article 17, paragraph 1 of the Regulation, you can obtain the cancellation of your Personal Data without undue delay and the Processing Owner will be obliged to delete your Personal Data, if at least one of the following reasons applies: a) Personal Data are no longer needed for the purposes that have been collected for or otherwise processed; b) you have proceeded to withdraw the consent on which your Personal Data Processing is based and there is no other legal ground for their processing; c) you have objected to the Processing in accordance with article 21, paragraph 1 or 2 of the Regulation and there are no overriding legitimate grounds for the processing of your Personal Data; d) your Personal Data have been illicitly processed; e) it is necessary to delete your Personal Data to comply with a legal obligation required by a Community or national law provision.

In some cases, as foreseen by article 17, paragraph 3 of the Regulation, the Processing Owner is entitled not to delete your Personal Data if their Processing is necessary, for instance, to exercise the right of freedom of expression and information, to fulfil a legal obligation, for purposes of public interest, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, for the establishment, exercise or defence of legal claims.

• Right to limit processing: you can obtain the limitation of the Processing in accordance with article 18 of the Regulation, when one of the following conditions is met: a) you have contested the accuracy of your Personal Data (the limitation will continue for the time required for the Processing Owner to verify the accuracy of such Data); b) the Processing is illegal, but you objected to the cancellation of your Personal Data and asked the limitation of their use instead; c) even if the Processing Owner no longer needs it for processing purposes, your Personal Data are for establishment, exercise or defence of legal claims; d) you objected to the Processing in accordance with article 21, paragraph 1, of the Regulation and you're waiting the verification whether the legitimate grounds of the Processing Owner possibly override yours.

In case of Processing limitation, your Personal Data will be processed, except for purpose of storage, only with your consent, or for the establishment, exercise or defence of legal claims, or to protect the rights of another natural or legal person, or for reasons of substantial public interest. In any case, we will inform you before such limitation is revoked.

- Right to data portability: at any time, you can request and receive, in accordance with
  article 20, paragraph 1 of the Regulation, all your Personal Data processed by the
  Processing Owner and/or Co-owners in a structured format, in common use and
  readable, or request their transmission to another Processing Owner without
  impediments. In this case, you will be responsible for providing us with all the exact
  details of the new processing owner, to whom you intend to transfer your Personal Data,
  by providing written authorization.
- Right to object: in accordance with article 21 of the Regulation, you can object, at any time, to the Processing of your Personal Data if a) your Personal Data are no longer needed for the purposes that have been collected for or otherwise processed; b) you have proceeded to withdraw the consent on which your Personal Data Processing is based and there is no other legal ground for their processing; c) you have objected to the Processing in accordance with article 21, paragraph 1 or 2 of the Regulation and there are no overriding legitimate grounds for the processing of your Personal Data; d) your Personal Data have been illicitly processed; e) it is necessary to delete your Personal Data to comply with a legal obligation required by a Community or national law provision.
- In some cases, as foreseen by article 17, paragraph 3 of the Regulation, the Processing
  Owner is entitled not to delete your Personal Data if their Processing is necessary, for
  instance, to exercise the right of freedom of expression and information, to fulfil a legal
  obligation, for purposes of public interest, for archiving purposes in the public interest,
  scientific or historical research purposes or statistical purposes, for the establishment,
  exercise or defence of legal claims.

To exercise all your rights, as identified above, simply contact the Processing Owner in the manner specified in Section E of this Policy.

We remind you that at any time you can turn to the DPO Representative of Reworld Media Italia in the manner prescribed by Section E of this Policy.

Moreover, you have the right to lodge a complaint to the control authority: without prejudice to your right to turn to any other administrative or judicial authority, in case you consider the Processing of your Personal Data, led by the Processing Owner, taking place in violation of the Regulation and/or of the applicable legislation, you can lodge a complaint to the Competent Authority for Personal Data Protection or to another competent control authority.