## INFORMATION NOTICE REGARDING TECHNICAL AND SESSION COOKIES

The rules governing the use of so-called "cookies" and other similar tools(web beacon/web bugs, clear GIFs, etc.) in terminals (personal computers, notebooks, tablet PCs, smartphones, etc.) employed by users has recently been amended following the implementation of the Directive 2009/136 which amended the "e-Privacy" Directive (2002/58/EC) and the provision "Identification of simplified procedures for the disclosure and acquisition of consent to the use of cookies - 8 May 2014".

Cookies are small text files that are sent to your terminal (usually your browser), where they are stored and then sent back to the same sites the next time visit by the same user. Cookies are used to perform computer authentication, track sessions and store specific information about users accessing the server and are usually present in each user's browser in very large numbers.

### Cookies on www Fromm-stretch.com

- Allow you to navigate efficiently from one page of the website to another.
- Store the user name and preferences you have entered.
- Eliminate the necessity to enter the same information (such as username and password) several times during your visit.
- Measure the use of services by Users, to optimise the browsing experience and the services themselves.
- Present advertising information targeted according to the interests and behaviour expressed by the User during navigation.

These features are divided into several categories:

- 1. Technical cookies
- 2. Analytical cookies

The following are the types of cookies used on the website www.fromm-stretch.com.

## 1. Technical cookies

They are necessary for the proper functioning of certain areas of the site and include persistent and session cookies. Without these cookies, the site or parts of it may not function properly. Therefore, they are always used, regardless of user preferences.

## 2. Analytical cookies

They are used to collect information on how the site is used.

The Owner uses this information for statistical analysis, to improve the site and simplify its use, as well as to monitor its proper functioning.

Questo tipo di cookie collects information in an aggregated and anonimous manner on the activity of users navigating www.fromm-stretch.com.

These cookies are installed directly by the owner and since they are used for functional purposes and analysis ("analytical cookies") their installation does not require express consent, just communication of their existence.

List of systems used:

- Google Analytics: for more information, please refer to the <u>privacy policy</u> tool's
- HotJar: for more information please refer to the <u>privacy policy</u> tool's

# How can technical and analytical cookies be disabled?

Please note that you do not need to give your consent to this type of cookie. They can be blocked as indicated in the following paragraphs but this may prevent you from using certain parts of the site.

Pursuant to Art.12 and according to the G.D.P.R. the saving of this type of cookie can be opposed in the following ways.

You can adjust both how it works and the options for limiting or blocking the cookies by changing the settings on your Internet browser.

Most Internet browsers are initially set to accept cookies automatically, but you can change these settings to block cookies or to be alerted whenever cookies are sent to your device.

There are several ways to manage cookies, so you should refer to your browser's instruction manual or help screen to see how to adjust or change your browser settings.

The user is in fact enabled to modify the default configuration and disable cookies (i.e. block them permanently), setting the highest level of protection. Below is the path to follow to manage cookies from the following browsers: If you are using different devices to view and access the Sites (e.g., computers, smartphones, tablets, etc.), you must ensure that each browser on each device is adjusted to reflect your cookie preferences. To delete cookies from your smartphone/tablet's Internet browser, please refer to your device's user manual.

- O Internet Explorer <u>-https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies</u>
- O Safari https://support.apple.com/it-it/guide/safari/sfri11471/mac
- O Chrome https://support.google.com/chrome/answer/95647?hl=it-IT&hlrm=fr&hlrm=en
- O Firefox http://support.mozilla.org/it-IT/kb/enable-and-disable-cookies-website-preferences
  - O Management of ad preferences
  - O Rules for the deactivation of Behavioural Advertising
  - O Add-on to disable Google Analytics

### TECHNICAL INFORMATION FROM THE GUARANTOR

http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/3585077

Information and consent for the use of cookies

Frequently asked questions

### 1. What are cookies?

Cookies are small text files that sites visited by users send to their terminals, where they are stored and then sent back to the same sites the next time they visit. So-called "third-party" cookies are, instead, set up by a different website from the one the user is visiting. This is because on each site there may be elements (images, maps, sounds, specific links to web pages of other domains, etc..) that reside on servers other than that of the site visited.

### 2. What are cookies for?

Cookies are used for different purposes: performing computer authentication, monitoring sessions, storing information on specific configurations regarding users accessing the server, storing preferences, etc..

### 3. What are "technical" cookies?

Cookies that are used to navigate or provide a service requested by the user. They are not used for any other purposes and are normally installed directly by the owner of the website.

Without the use of these cookies, some operations could not be carried out or would be more complex and/or less secure, such as home banking activities (display of account statements, transfers, payment of bills, etc..), as the cookies are essential to enable the user to perform these operations and maintain the identification of the user during the session.

# 4. Are analytical cookies "technical" cookies?

No. The Guarantor (see **order of 8 May 2014**) specifies that they can be assimilated into technical cookies only if used directly by the owner of the site for optimisation purposes, to collect information in aggregate form on the number of users and how they visit the site. Under these conditions, the same rules for information and consent apply to cookie analytics as for technical cookies.

# 5. What are "profiling" cookies?

These are used to track the user's navigation on the web and create profiles on their tastes, habits, choices, etc. With these cookies, advertising messages can be transmitted to the user's terminal in line with the preferences they have expressed while browsing online.

## 6. Is User consent necessary for cookies to be installed on their terminal?

It depends on the purpose for which the cookies are used and, therefore, whether they are "technical" or "profiling" cookies.

Consent for the installation of technical cookies is not required, but it is necessary to provide the information (Art. 13 of the Privacy Code). Profiling cookies, on the other hand, can only be installed on the user's terminal if the user has given consent after having been informed via simplified format.

# 7. How should the website owner provide simplified information and request consent to the use of profiling cookies?

As established by the Guarantor in the measure indicated in question 4, the information must be set at two

When the user accesses a website (on the home page or any other page), a banner must immediately appear containing initial "brief" information, the request for consent to the use of cookies and a link to access more "extensive" information. On this page, the user can find more detailed information about cookies in order to be able to choose which specific cookies to authorise.

#### 8. Waht form should the banner take?

The size of the banner must be such that it partly covers the content of the web page that the user is visiting. It must only be possible to delete it by active user intervention, i.e. by selecting an element from the underlying page.

### 9. What information should the banner contain?

The banner must specify that the site uses profiling cookies, possibly also "third-party" cookies, which allow advertising messages to be sent in line with user preferences.

It must contain the link to the detailed information and an indication that, through that link, it is possible to deny consent to the installation of any cookie.

Please note that choosing to continue by "skipping" the banner, denotes consent to the use of cookies.

# 10. How can the acquisition of consent through the use of banners be documented?

To keep track of the consent acquired, the owner of the site may use a special technical cookie; a system that is not particularly invasive and which in turn does not require further consent.

In the presence of such "documentation", it is not necessary for the brief information to be repeated at the user's second visit to the site, notwithstanding the latter's option to deny consent and/or change their options at any time, and easily; for example by accessing the detailed information, which must therefore be linkable from each page of the site.

## 11. Can online consent to the use of cookies be sought only through the use of banners?

No. The owners of the sites always have the option to use different methods from that identified by the Guarantor in the above measure, provided that the chosen methods have all the requirements of validity of consent required by law.

## 12. Does the obligation to use banners also apply to owners of sites that use only technical cookies?

No. In this case, the owner of the site can give the information to users in the manner he deems most appropriate, for example, through the inclusion of the relevant information in the privacy policy indicated on the site.

### 13. What should the "detailed" information contain?

It must contain all the elements required by law, describe analytically the characteristics and purpose of the cookies installed by the site and allow the user to select/deselect individual cookies.

It must include an updated link to the information and consent forms of third parties with whom the owner has entered into agreements for the installation of cookies through its website.

Finally, the user must also be reminded that he/she can express his/her options on cookies through the settings of the browser used.

# 14. Who is responsible for providing information and requesting consent for the use of cookies?

The owner of the website that installs profiling cookies.

For third-party cookies installed through the site, the obligations of information and consent are on the third party, but the owner of the site, as a technical intermediary between them and users, is required to include links to the updated information and third-party consent forms in the "detailed" information.

## 15. Should the use of cookies be notified to the Guarantor?

Profiling cookies, which usually remain over time, are subject to the obligation to notify, while cookies that have different purposes and fall within the category of technical cookies, do not have to be notified to the Guarantor.

# 16. When do the measures prescribed by the Guarantor with the order of 8 May 2014 enter into force?

The Guarantor has provided for a transitional period of one year from the publication of the order in the Official Journal to allow interested parties to become compliant. This period shall end on 2 June 2015.