# Cookie Policy of Arnoldo Mondadori Editore S.p.A.

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

The Mondadori Group, a corporate group consisting of the parent company Arnoldo Mondadori Editore S.p.A. and the companies controlled by it pursuant to and for the purposes of article 2359 of the Italian Civil Code (hereinafter the "Mondadori Group"), has always considered the protection of the personal data of its and/or potential customers and users to be of fundamental importance, ensuring that the processing of personal data, carried out by any means, whether automated or manual, is carried out in full compliance with the protections and rights recognized by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "Regulation") and by the other applicable rules on the protection of personal data. By the term personal data we mean the definition contained in article 4, point 1) of the Regulation, i.e. "any information relating to an identified or identifiable natural person; 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 the "Personal Data"). The Regulation provides that, before proceeding with the processing of Personal Data - by this term meaning, according to the relevant definition contained in article 4, point 2) of the Regulation, "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, organization, 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 that the person to whom such Personal Data belong, in this case you as a user/visitor (hereinafter the "User") of this website (hereinafter the "Website") and/or mobile application (hereinafter "Mobile App") is informed about the reasons for which such data are requested and how they will be used. To this end, this document aims to provide you, in a simple and intuitive way, with all the useful and necessary information so that you can be informed in a conscious way about the use and Processing of your Personal Data carried out by the Cookies as defined below and used by this Website. The extended information on the use of Cookies and similar technologies (so-called **Cookie Policy**), therefore, has been drawn up based on the principle of transparency and of all the elements required by article 13 of the Regulation and is divided into individual sections (hereinafter "Sections" and individually "Section") each of which deals with a specific topic in order to make the reading faster, easier and easier to understand.

## **B.** What are Cookies?

Cookies are strings of text consisting of portions of code sent by a web server (e.g., a website) to an Internet browser and installed within it. In particular, they are small text files that the websites visited by Users send to their terminals, where such strings are stored and then retransmitted to the websites on subsequent visits. Almost all browsers are set to allow the automatic storage of cookies on the User's terminal. Cookies are used for different and various purposes, have different characteristics and can be used by the Data Controller as defined below, as well as by third parties who use or may use the Website, also in combination with each other, the following categories of cookies, divided according to the classification proposed in Opinion 04/2012 on the exemption from consent for the use of cookies issued by the Working Group ex art. 29.

## **Session or permanent Cookies**

Cookies can expire at the end of a browser session (the period between the opening of a browser window by the User and its closing) or can be stored for a longer period of time. Session Cookies are those that allow websites to link the actions of a User during a browser session. Session Cookies expire when the browser session ends. Permanent cookies are stored on a User's device between browser sessions, for varying periods of time, and allow the User's preferences or actions to be stored 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 carrying out the transmission of a communication over an electronic communications network, or to the extent strictly

necessary for the provider of an information society service explicitly requested by the subscriber or User to provide such service. For the installation of such cookies, the prior consent of the Users is not required where they are used directly by the website operator. Profiling cookies are designed to create profiles relating to the User and are used to send advertising messages in line with the preferences expressed by the User when browsing the web. Due to the particular features that such cookies may have, European and Italian legislation requires that the User must be adequately informed about the use of the same, through a brief information notice (banner) and an extended one on the website, and that he/she must express his/her express consent in this regard the first time he/she visits the website. Such consent may be expressed by interacting with the brief information banner present on the landing page of the website, as indicated in such banner, or may be provided or denied in a selective manner. This consent is kept track of on subsequent visits. However, the User always has the possibility to revoke, in whole or in part, the consent already expressed.

## First-party or third-party cookies

A cookie is "first-party" (so-called first party cookie) or "third-party" (so-called third party cookie) based on the website or domain from which it comes. First-party cookies are, in essence, cookies set and/or managed by the owner of the website. For these cookies, the obligation to provide information, to obtain consent and/or to allow the possible blocking of cookies lies with the owner of the website. Third-party cookies are cookies set by a domain other than the one visited by the User. For these cookies, the obligation to provide information and to indicate the methods for any consent and/or blocking of cookies lies with the third party, while the owner of the website is only obliged to insert on the website the link to the website of the third party where these elements are available.

# C. Other technologies similar to Cookies used within the Mobile App

The Data Controller and third parties, especially in the context of mobile applications, may use, in addition to Cookies, similar technologies aimed at storing and retrieving information relating to your device and its use. These activities may be carried out through the use of:

#### Pixel Tag or Web Beacon

A pixel tag (also known as a "web beacon" or "tracking pixel") is a transparent graphic file of reduced size (usually 1 pixel x 1 pixel) that is inserted in a web page, in combination with a Cookie, or within a mobile application that allows the collection of information relating to the use of the web page and/or the mobile application that contains the tracking pixel. Pixel tags can be used for various purposes, such as, by way of example and not limited to, analysing the use of websites and/or mobile applications, monitoring and reporting on advertising activities and personalising advertising and content.

### Mobile device identifiers and SDKs

A mobile SDK is the version of a pixel tag or web beacon (as described above) for mobile applications only. An SDK is a piece of computer code that mobile application developers can include in their applications to enable the display of advertisements, the collection of data and the implementation of related services. This technology is used to provide you with certain advertisements and features through mobile applications and browsers based on analytical information associated with your mobile device or tablet. Some of the services listed below based on the functionality offered to Users, focused on the use of third-party SDKs, may not require the User's consent. These third parties, moreover, may - in addition to what is specified in this Cookie Policy and also without the knowledge of the Data Controller - carry out further tracking activities of the User. For detailed information on this, please consult the respective privacy policies of the services listed, within which you can receive all the information on the related Processing and deny your consent to it.

**Jointag.** The purpose of JoinTag's services is to offer Users of publishers (through their websites and/or applications) personalised advertising, and to be a technical support for other possible third parties who intend to offer the same services (the "Jointag Partners"). JoinTag and the Jointag Partners use identifiers to identify Users and provide targeted advertising based on their behaviour and/or movements. For more information, or to deactivate JoinTag's services or those of the Jointag Partners, please click here or write to privacy@jointag.com.

**Nielsen Measurement.** The Nielsen measurement system allows to collect usage statistics of the application in order to better understand the interests and behaviours of customers. The service is enabled by default. If the User wishes to deactivate the Nielsen measurement, he/she can do so by enabling the setting "Limit data collection" (iOS devices) and "Disable ad personalisation" (Android). If the application is installed on more than one device, the setting must be changed on each of them. (Read Nielsen's Privacy Policy: https://www.nielsen.com/legal/privacy-principles/digital-measurement-privacy-statement/?lang=it).

**Marfeel.** We/our partners may/may store and/or access information on a device (e.g. cookies) and process Personal Data (e.g. IP addresses) to display personalised ads and content, measure ads and content, develop

products and insights on the audience and create a profile of personalised ads. You can object to this change or change your choices (e.g. withdraw consent) at any time, by clicking on the "More options" or "Manage your cookies" button in the main menu of the website. For certain purposes we may use precise geolocation data and/or actively scan device characteristics to identify it.

**Push notification.** By using the Mobile App, you can choose whether to receive push notifications from the Data Controller on your mobile device or tablet by accepting this service during the configuration of the Mobile App within your device or tablet. If you decide at a later date that you no longer wish to receive further push notifications, you can deactivate them using the functionality of your mobile device and/or the Mobile App itself.

# D. Who will process your Personal Data?

The data controller according to the relevant definition contained in article 4, point 7) of the Regulation, "the natural or legal person, public authority, service or other body that, individually or together with others, determines the purposes and means of the processing of personal data" is:

**Arnoldo Mondadori Editore S.p.A.**, with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), registered in the Register of Companies of Milan, Tax Code no. 07012130584 and VAT no. 08386600152 (hereinafter the "**Data Controller**")

## E. Who can you contact?

The Data Controller can be contacted through the following channels:

- writing to the Privacy Office of the Mondadori Group at the parent company Arnoldo Mondadori Editore S.p.A., Via Mondadori 1, 20054 Segrate (Milan);
- sending an e-mail to the e-mail address privacy@mondadori.it to the attention of the Privacy Office of the Mondadori Group;
- calling the telephone number +39 02 75421 and asking for the Privacy Office of the Mondadori Group.

In addition, in order to facilitate the relations between you, as the data subject, i.e. the "identified or identifiable natural person" to whom the Personal Data refer pursuant to article 4, point 1) of the Regulation (hereinafter the "**Data Subject**") and the Data Controller, the Regulation has provided, in some specific cases, for the appointment of a control and support figure who, among the various tasks assigned, also acts as a point of contact with the Data Subject. The Mondadori Group has adopted this figure of "data protection officer", c.d. "Data Protection Officer", pursuant to article 37 of the Regulation (hereinafter the "**DPO**"). The DPO, pursuant to and for the purposes of article 39 of the Regulation, is called upon to perform, inter alia, the following activities:

- inform and provide advice to the Data Controller, the data processor and the employees who carry out the Processing on the obligations arising from the Regulation and from other provisions of the European Union or Member States relating to the protection of Personal Data;
- monitor and supervise compliance with the Regulation, the applicable regulations on the protection of Personal Data and the policies and procedures adopted by the Data Controller;
- provide support in the responses to the Data Subject;
- cooperate with the Data Protection Authority or other competent supervisory authority.

As provided for by article 38 of the Regulation, you may freely contact the DPO for all matters relating to the Processing of your Personal Data and/or if you wish to exercise your rights as provided for in Section I of this Information Notice, by sending a written communication to the e-mail address dpo@mondadori.it and/or writing to the Data Protection Officer of the Mondadori Group at Arnoldo Mondadori Editore S.p.A., via Mondadori 1, 20054 - Segrate (MI).

# **F.** For what purposes will your Personal Data be processed and what Cookies will be used?

In this Section, all the information on the Cookies installed through the Website is indicated. In particular, the Data Controller uses Cookies of a technical and profiling nature. Technical cookies can be divided into the following sub-categories:

- Navigation cookies, through which you can save your browsing preferences and possibly optimise the User's browsing experience;
- Analytics cookies, also from third parties, through which statistical information is acquired on how Users browse. This information is processed in aggregate and anonymous form;
- Functionality cookies, also from third parties, used to activate specific functionalities of this Website and necessary to provide the service or improve it.

These cookies, as specified in Section B of this Cookie Policy, being of a technical nature, do not require your prior consent to be installed.

Profiling cookies used by the Data Controller have the purpose of profiling and communicating for commercial purposes, in different advertising forms, personalised according to your interests and your behaviour. Such cookie cannot be installed without obtaining your consent, which will constitute the legal basis of the Processing. Some of the services listed below based on the functionality offered to Users, focused on the use of third-party Cookies, may not require the User's consent. These third parties, moreover, may in addition to what is specified in this Cookie Policy and also without the knowledge of the Data Controller carry out further tracking activities of the User. For detailed information on this, please consult the respective privacy policies of the services listed, within which you can receive all the information on the related Processing and deny your consent to it. It should be noted that the Data Controller has allowed the related company Mediamod S.p.A. to process and transfer to third parties data collected through the use of the thirdparty Cookie called Salesforce Audience Studio as better described in the section "Remarketing and behavioural targeting" where you can consult the relevant Cookie Policy and express, if you wish and freely, your opt-out.

#### **Commercial affiliation**

This type of service allows this Application to display advertisements for products or services offered by third parties. Advertisements can be displayed either as advertising links or as banners in various graphic forms. Clicking on the icon or banner published on this Application is tracked by the third-party services listed below and shared with this Application. To find out which data is collected, please refer to the privacy policies of each service. AliExpress Affiliate (Alibaba.com Singapore E-Commerce Private Limited) AliExpress Affiliate is a commercial affiliation service provided by Alibaba.com Singapore E-Commerce Private Limited. Personal Data processed: Cookies and Usage Data. Processing location: Singapore – Privacy Policy. Amazon Affiliation (Amazon) Amazon Affiliation is a commercial affiliation service provided by Amazon.com Inc. Personal Data processed: Cookies and Usage Data. Processing location: United States - Privacy Policy. Anastore Affiliate Program (Anastore Bio S.L.) Anastore Affiliate Program is a commercial affiliation service provided by Anastore Bio S.L. Personal Data processed: Cookies and Usage Data. Processing location: France - Privacy Policy. Awin (AWIN AG) Awin is a commercial affiliation service provided by AWIN AG. Personal Data processed: Cookies and Usage Data. Processing location: Germany - Privacy Policy. Banggood Affiliates Program (Banggood Ltd) Banggood Affiliates Program is a commercial affiliation service provided by Banggood Ltd. Personal Data processed: Cookies and Usage Data. Processing location: Hong Kong - Privacy Policy. Booking.com Affiliate Partner Programme (Booking.com B.V.) Booking.com Affiliate Partner Programme is a commercial affiliation service provided by Booking.com B.V., a company part of the Priceline.com group. Personal Data processed: Cookies and Usage Data. Processing location: Netherlands - Privacy Policy. CJ Affiliate (Commission Junction LLC (part of Publicis Groupe)) CJ Affiliate is a commercial affiliation service provided by Commission Junction LLC (part of Publicis Groupe). Personal Data processed: Purchase history, Usage Data, and Tracking Tools. Processing location: United States - Privacy Policy. eBay Partner Network (eBay, Inc.) eBay Partner Network is a commercial affiliation service provided by eBay, Inc. Personal Data processed: Cookies and Usage Data. Processing location: United States - Privacy Policy.

#### **Effiliation (Effiliation SAS)**

Effiliation is a commercial affiliation service provided by Effiliation SAS.

Personal Data processed: Cookies and Usage Data. Processing location: France - Privacy Policy. links2revenue (WebCom Consulting OG) links2revenue is a commercial affiliation service provided by WebCom Consulting OG. Personal Data processed: Cookies and Usage Data. Processing location: Austria - Privacy Policy. Logitravel Affiliate Program (TRAVELCONCEPT, S.L.U) Logitravel Affiliate Program is a commercial affiliation service provided by TRAVELCONCEPT, S.L.U. Personal Data processed: Cookies and Usage Data. Processing location: Spain – Privacy Policy. NetAffiliation (Kwanko SA) NetAffiliation is a commercial affiliation service provided by Kwanko SA. Personal Data processed: Cookies and Usage Data. Processing location: France - Privacy Policy. **Bravofly Affiliate Program (Bravonext SA)** Bravofly Affiliate Program is a commercial affiliation service provided by Bravonext SA. Personal Data processed: Cookies and Usage Data. Processing location: Switzerland - Privacy Policy. Desigual Affiliate Program (ABASIC, S.L.) Desigual Affiliate Program is a commercial affiliation service provided by ABASIC, S.L. Personal Data processed: Cookies and Usage Data. Processing location: Spain - Privacy Policy. Fotolia Affiliate Program (Adobe) Fotolia Affiliate Program is a commercial affiliation service provided by Adobe. Personal Data processed: Cookies and Usage Data. Processing location: United States - Privacy Policy. YOOX Affiliate Program (NET-A-PORTER GROUP S.p.A.) YOOX Affiliate Program is a commercial affiliation service provided by NET-A-PORTER GROUP S.p.A. Personal Data processed: Cookies and Usage Data. Processing location: Italy – Privacy Policy. zooplus Affiliate Program (Zooplus AG) zooplus Affiliate Program is a commercial affiliation service provided by Zooplus AG. Personal Data processed: Cookies and Usage Data. Processing location: Germany - Privacy Policy. ShareAsale (ShareAsale.com Inc.) ShareAsale is a commercial affiliation service through banners provided by ShareAsale.com Inc. Personal Data processed: Cookies and Usage Data. Processing location: United States - Privacy Policy. Skimlinks (Skimbit Ltd) Skimlinks is a commercial affiliation service provided by Skimbit Ltd. Personal Data processed: Cookies and Usage Data. Processing location: United Kingdom - Privacy Policy- Opt out. Smart4ads (SMART DIGITAL ADVERTISING, S.L.) Smart4ads is a commercial affiliation service provided by SMART DIGITAL ADVERTISING, S.L. Personal Data processed: Cookies and Usage Data. Processing location: Spain - Privacy Policy. TradeTracker (TradeTracker.com) TradeTracker is a commercial affiliation service provided by TradeTracker.com. Personal Data processed: Cookies and Usage Data. Processing location: Consult TradeTracker's privacy policy - Privacy Policy. **Content Commenting** 

Commenting services allow Users to make and publish their comments on the content of this Application. Depending on the settings chosen by the Owner, Users may also leave comments anonymously.

If there is an email address among the Personal Data provided by the User, it could be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a third-party provided commenting service is installed, it may still collect web traffic data for the pages where the commenting service is installed, even when Users do not use the commenting service.

Disqus (Disqus)

Disqus is a commenting solution provided by Disqus that allows this Application to add commenting features to any content.

Personal Data processed: Data communicated while using the service, Usage Data, and Tracking Tools. Processing location: United States – <u>Privacy Policy</u> – <u>Opt out</u>.

#### Facebook Comments (Meta Platforms, Inc.)

Facebook Comments is a service managed by Meta Platforms, Inc. that allows the User to leave comments and share them within the Facebook platform.

Personal Data processed: Cookies and Usage Data.

Processing location: United States – <u>Privacy Policy</u>.

#### Heat Mapping and Session Recording

Heat mapping services are used to display the areas of a page where Users move the mouse or click the most, thus showing which areas attract the most interest. These services allow monitoring and analyzing web traffic and keep track of User behavior. Some of these services may record sessions and make them available for later visual review.

#### Crazy Egg (Crazyegg)

Crazy Egg is a heat mapping service provided by Crazy Egg, Inc.

Personal Data processed: Cookies and Usage Data.

Processing location: United States – <u>Privacy Policy</u>.

#### Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a heat mapping and session recording service provided by Hotjar Ltd. Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers.

More <u>Information on opting out</u> of Hotjar is available here.

Personal Data processed: Cookies, Usage Data, and various types of Data as specified by the service's privacy policy. Processing location: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Hosting and Backend Infrastructure

This type of service has the function of hosting Data and files that enable this Application to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Application. Some of the services listed below, if present, may work on geographically distributed servers, making it difficult to determine the actual location where the Personal Data is stored. **Akamai Content Delivery Network (Akamai Technologies, Inc.)** Akamai is a hosting service provided by Akamai Technologies, Inc. Personal Data processed: Cookies and Usage Data.

Processing location: United States – Privacy Policy.

#### • Infrastructure for Advertising Services

This type of service has the purpose of providing an infrastructure for advertising services that allows this Application to maintain its own network that delivers optimized and targeted ads. To this end, the services listed below may allow the Owner to monitor individual User visits and their browsing patterns, even with the help of Cookies or other Identifiers. This tracking can occur across different sites or applications in order to serve optimized and targeted advertising.

Neodata Ad Server (Neodata Group S.r.l.)

Neodata Ad Server is an advertising server supply service provided by Neodata Group S.r.l. Personal Data processed: Cookies and Usage Data.

Processing location: Italy – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Interaction with Online Survey Platforms

This type of service allows interaction with online survey platforms, managed by third parties, directly from the pages of this Application. If one of these services is installed, it may still collect Usage Data for the pages where it is installed, even if Users do not use the service.

Hotjar Poll & Survey widgets (Hotjar Ltd.)

Hotjar Poll & Survey widgets are services that allow interaction with the Hotjar platform provided by Hotjar Ltd. Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. More <u>Information on opting out</u> of Hotjar is available here. Personal Data processed: Cookies, Usage Data, and various types of Data. Processing location: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### • Interaction with Data Collection Platforms and Other Third Parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Application for the purpose of saving and reusing data. If one of these services is installed, it may still collect Usage Data for the pages where it is installed, even if Users do not use the service.

#### Hotjar Recruit User Testers (Hotjar Ltd.)

The Hotjar Recruit User Testers widget is a service that allows interaction with the data collection platform Hotjar managed by Hotjar Ltd. Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers.

More Information on opting out of Hotjar is available here.

Personal Data processed: Cookies, Usage Data, and various types of Data.

Processing location: Malta – Privacy Policy – Opt Out.

#### • Interaction with Social Networks and External Platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application. The interactions and information obtained by this Application are always subject to the User's privacy settings for each social network. This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services to make sure that the processed data on this Application is not being connected back to the User's profile.

#### LinkedIn Button and Social Widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Cookies and Usage Data.

Processing location: United States - Privacy Policy.

#### Facebook Like Button and Social Widgets (Meta Platforms, Inc.)

The "Like" button and Facebook social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc.

Personal Data processed: Cookies and Usage Data.

Processing location: United States - Privacy Policy.

#### Twitter Tweet Button and Social Widgets (Twitter, Inc.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Cookies and Usage Data.

Processing location: United States - Privacy Policy.

#### Pinterest "Pin it" Button and Social Widgets (Pinterest, Inc.)

The "Pin it" button and social widgets of Pinterest are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data processed: Cookies and Usage Data.

Processing location: United States - Privacy Policy.

#### Traffic Optimization and Distribution

This type of service allows this Application to distribute their content using servers located across different countries and to optimize their performance. Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser. Given the distributed nature of this system, it is difficult to determine the places to which the contents that may contain Personal Data of the User are transferred.

#### Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc. The way Cloudflare is integrated means that it filters all the traffic through this Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

Personal Data processed: Cookies and various types of Data as specified by the service's privacy policy. Processing location: United States – <u>Privacy Policy</u>.

#### • 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. In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the Network Advertising Initiative opt-out page.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or general advertising settings.

#### Adabra (Ad Spray S.r.l.)

Adabra is a marketing intelligence and behavioral targeting service provided by Ad Spray S.r.l. Adabra tracks User behavior using tracking technology. This Data is then used to personalize the User's experience and to deliver targeted messages and communications. Adabra may also connect the collected Data with other networks, including advertising networks, and enable these third parties to track and target the User. The Owner, unless otherwise specified in this document, has no direct relationship with the third parties that Adabra may include. Personal Data processed: Cookies and Usage Data.

Processing location: Italy – <u>Privacy Policy</u>.

#### Adform (Adform A/S)

Adform is an advertising service provided by Adform A/S.

Personal Data processed: Cookies and Usage Data.

Processing location: Denmark – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Amazon Mobile Ads (Amazon)

Amazon Mobile Ads is an advertising service provided by Amazon.

Personal Data processed: Cookies and Usage Data.

Processing location: United States – Privacy Policy.

#### AppNexus (AppNexus Inc.)

AppNexus is an advertising service provided by AppNexus Inc.

Personal Data processed: Cookies and Usage Data.

Processing location: 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.

### Processing location: Germany – <u>Privacy Policy</u>.

#### Clickpoint (CLICKPOINT MARKETING SLU.)

Clickpoint is an advertising service provided by CLICKPOINT MARKETING SLU.

Personal Data processed: Cookies and Usage Data.

Processing location: Spain – Privacy Policy.

#### Criteo (Criteo SA)

Criteo is an advertising service provided by Criteo SA.

Personal Data processed: Cookies and Usage Data.

Processing location: France – <u>Privacy Policy</u> – <u>Opt Out</u>.

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

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

Personal Data processed: Cookies and Usage Data.

Processing location: Italy – <u>Privacy Policy</u>.

#### DoubleClick for Publishers - Mondadori (Google LLC)

DoubleClick for Publishers is an advertising service provided by Google Inc. which the Concessionaire can conduct advertising campaigns in conjunction with external advertising networks. The Mondadori Group and the Concessionaire, unless specified in this document, have no direct relationship with such external networks. For an understanding of Google's use of data, please consult <u>Google's partner policies</u>. This service uses the "Doubleclick" Cookie, which tracks the use of this Web Space and the User's behavior in relation to advertisements, products, and services offered. The User can decide at any time not to be tracked by the Doubleclick cookie by deactivating it through the following link: <u>www.google.com/settings/ads/onweb/optout?hl=en</u>.

Personal Data processed: Cookies and Usage Data.

Processing location: United States - 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.

Processing location: 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 the use of this Application and the User's behavior in relation to advertisements, products, and services offered. The User can decide at any time to disable all DoubleClick cookies by going to: <u>Ad Settings</u>.

For an understanding of Google's use of data, please consult Google's partner policies.

Personal Data processed: Cookies and Usage Data.

Processing location: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

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

OpenX Ad Exchange is an advertising service provided by OpenX Technologies, Inc. The service provides an ad management platform that facilitates the optimization of advertisements among multiple ad networks, potentially consisting of third parties both to OpenX and the Owner.

Personal Data processed: Cookies and Usage Data.

Processing location: 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 by the service's privacy policy.

Processing location: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### PubMatic (PubMatic, Inc.)

PubMatic is an advertising service provided by PubMatic, Inc.

Personal Data processed: Cookies and Usage Data.

Processing location: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### 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.

Processing location: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

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

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

Personal Data processed: Cookies and Usage Data.

Processing location: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Smart AdServer (Smart AdServer SAS)

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

Personal Data processed: Cookies and Usage Data.

#### Processing location: France – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Teads (Teads SA)

Teads is an advertising service provided by Teads SA.

Personal Data processed: Cookies and Usage Data.

Processing location: Luxembourg – Privacy Policy – Opt out.

#### Tradedoubler (Tradedoubler)

Tradedoubler is an advertising service provided by TradeDoubler AG. For information on the use of TradeDoubler Cookies and how to block them: Tradedoubler's targeting technologies.

Personal Data processed: Cookies and Usage Data

Location of processing: Sweden – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### TubeMogul Advertising Platform (TubeMogul, Inc.)

The TubeMogul Advertising Platform is an advertising service provided by TubeMogul, Inc.

Personal Data processed: Cookies and Usage Data.

Location of processing: United States – 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.

Location 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, from that moment Yahoo App Publishing will stop tracking data for the device identified by the provided MAC address

and/or device identifier. Yahoo App Publishing will cease sending advertisements and/or recommendations to that MAC address and/or unique device identifier across all publishers. Personal Data processed: Cookies and Usage Data. Location of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>. **Zanox (Zanox)** Zanox is an advertising service provided by ZANOX.de AG.

Personal Data processed: Cookies and Usage Data.

Location of processing: Germany – <u>Privacy Policy</u>.

#### Permutive (Permutive Ltd.)

Permutive is an advertising service provided by Permutive Ltd. Personal Data processed: Usage Data and Tracking Tools. Location 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: Usage Data and Tracking Tools. Location of processing: United States – Privacy Policy – Opt out.

#### Remarketing and Behavioral Targeting

This type of service allows this Application and its partners to communicate, optimize, and serve advertising based on past use of this Application by the User. This activity is facilitated by tracking Usage Data and by using Tracking Tools to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activities. Some services offer a remarketing option based on email address lists. In addition to the optout features offered by the services listed below, the User can opt out by visiting the <u>Network Advertising Initiative</u> <u>opt-out page</u>. **Users can also choose not to participate in certain advertising features through their device settings, such as mobile device advertising settings or general advertising configuration. Google Signals (Google Ireland Limited)** 

This Application uses Google Signals, a feature of Google Analytics that associates the information about views collected by this Application with Google information from accounts of Google Users who have consented to this association for ad personalization. This Google information may include the User's location, search history, YouTube history, and data from Google's partners and is used to provide aggregated and anonymized insights into Users' cross-device behaviors.

If a User is part of the above-described association, <u>he/she can access and/or delete such data through Google's</u> <u>MyActivity feature</u>.

Personal Data processed: Cookies and Usage Data.

Location of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Oracle BlueKai (DMP) (Oracle Corporation)

Oracle BlueKai (DMP) is a remarketing and behavioral targeting service provided by Oracle Corporation. Oracle BlueKai (DMP) uses tracking technology to monitor User behavior. This data is then used to personalize the User's experience and to provide targeted advertising. Oracle BlueKai (DMP) may also connect the data collected with other networks, including advertising networks, and enable these third parties to track and target the User. The Data Controller, unless otherwise specified in this document, has no direct relationship with the third parties that Oracle BlueKai (DMP) may include.

Personal Data processed: Cookies and Usage Data.

Location of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

Remarketing with Google Analytics (Google Ireland Limited)

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google Ireland Limited that links the tracking activity performed by Google Analytics and its Tracking Tools with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Cookies and Usage Data.

Location of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Salesforce Audience Studio (Salesforce.com, inc.)

Salesforce Audience Studio is a remarketing and behavioral targeting service provided by Salesforce.com, inc. Salesforce Audience Studio uses tracking technology to monitor User behavior. This data is then used to personalize the User's experience and to provide targeted advertising. Salesforce Audience Studio may also connect the data collected with other networks, including advertising networks, and enable these third parties to track and target the User. The Data Controller, unless otherwise specified in this document, has no direct relationship with the third parties that Salesforce Audience Studio may include.

Personal Data processed: Cookies and Usage Data.

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

#### • Statistics

The services contained in this section enable the Data Controller to monitor and analyze traffic data and are used to track User behavior.

#### Adobe Analytics (Adobe)

Adobe Analytics is a statistical service provided by Adobe.

Personal Data processed: Cookies and Usage Data.

Location of processing: United States – Privacy Policy – Opt Out.

#### Audiweb (Audiweb S.r.l.)

This service uses the Nielsen Audience Measurement statistical service, provided by The Nielsen Company, as a data source for the registration, measurement, and dissemination of online media usage data. For this service to function, Nielsen Audience Measurement uses and processes Facebook User data. In particular, this data enriches the census information collected, adding information related to the sex and age of Users.

Information on opt-out can be found here, or here for mobile device Users.

Personal Data processed: Cookies and Usage Data.

Location of processing: Italy – <u>Privacy Policy</u> – <u>Opt out</u>.

#### ComScore Analytics (ComScore, Inc.)

ComScore is a statistical service provided by ComScore, Inc.

Personal Data processed: Cookies and Usage Data.

Location of processing: United States - Privacy Policy.

#### ShinyStat Free (ShinyStat S.p.a. (SevenData S.p.a.))

ShinyStat Free is a statistical service provided by ShinyStat S.p.a. (SevenData S.p.a.). This statistical service anonymizes the User's IP address.

Personal Data processed: Cookies and Usage Data.

Location of processing: Italy – Privacy Policy – Opt Out.

#### **Google Analytics (Google Ireland Limited)**

Google Analytics is a web analysis service provided by Google Ireland Limited ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Application, compiling reports, and sharing them with other Google services. Google may use the Personal Data to contextualize and personalize the ads of its advertising network.

Personal Data processed: Cookies and Usage Data.

#### Location of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Hotjar Form Analysis & Conversion Funnels (Hotjar Ltd.)

Hotjar is a statistical service provided by Hotjar Ltd. Hotjar respects the generic "Do Not Track" headers. This means that the browser can tell the script not to collect any User data. This is a setting available in all major browsers.

More <u>information on opting out</u> from Hotjar can be found here.

Personal Data processed: Cookies and Usage Data.

Location of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Facebook Ads conversion tracking (Facebook pixel) (Meta Platforms, Inc.)

Facebook Ads conversion tracking (Facebook pixel) is a statistics service provided by Meta Platforms, Inc. that connects data from the Meta ad network with actions taken within this Application. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram, and Audience Network.

Personal Data processed: Cookies and Usage Data.

Location of processing: United States – Privacy Policy.

#### Yahoo Advertising conversion tracking (Yahoo! Inc.)

Yahoo Advertising conversion tracking is a statistics service provided by Yahoo! Inc. that connects data from the Yahoo ad network with actions taken within this Application.

Personal Data processed: Cookies and Usage Data.

Location of processing: United States – Privacy Policy.

#### Nielsen Audience Measurement (The Nielsen Company, LLC)

Nielsen Audience Measurement is a statistical service provided by The Nielsen Company, LLC.

Personal Data processed: Cookies and Usage Data.

Location of processing: United States – Privacy Policy – Opt Out.

#### Webtrekk Analytics (Webtrekk GmbH)

Webtrekk Analytics is a statistical service provided by Webtrekk GmbH. User IP addresses are never permanently saved to disk in their original form. They are processed and immediately deleted. Further details on the technical

configuration and implementation of Webtrekk Analytics are available here and/or by contacting the Data Controller.

Personal Data processed: Cookies and Usage Data. Location of processing: Germany – <u>Privacy Policy</u>. **Audiens (Audiens S.r.l.)** Audiens is a statistical service provided by Audiens srl.

Personal Data processed: Cookies and Usage Data. Location of processing: Italy – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### • Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them. This type of service may still collect web traffic data for the pages where the service is installed, even when users do not use it.

#### Vimeo Video (Vimeo, LLC)

Vimeo is a content viewing service for video content managed by Vimeo, LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Cookies and Usage Data.

Location of processing: United States – Privacy Policy.

#### Google Maps Widget (Google Ireland Limited)

Google Maps is a map visualization service managed by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Cookies and Usage Data.

Location of processing: Ireland – <u>Privacy Policy</u>.

## Instagram Widget (Meta Platforms, Inc.)

Instagram is an image visualization service managed by Meta Platforms, Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Cookies and Usage Data.

Location of processing: United States – Privacy Policy.

#### Spotify Widget (Spotify AB)

Spotify is an audio content delivery service managed by Spotify AB that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Cookies and Usage Data.

Location of processing: Sweden – Privacy Policy.

#### YouTube Video Widget (Google Ireland Limited)

YouTube is a video content visualization service managed by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Cookies and Usage Data.

Location of processing: Ireland – Privacy Policy.

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

In addition to what is specified within this Cookie Policy, you can manage preferences for Cookies directly within your browser and prevent – for example – third parties from installing Cookies. Through the browser preferences, it is also possible to delete Cookies installed in the past, including the Cookie where the consent to the installation of Cookies by this Website is saved. Please note that disabling all Cookies, the functioning of this Website may be compromised. You can find information on how to manage Cookies in your browser at the following addresses: <u>Google Chrome</u>, <u>Mozilla Firefox</u>, <u>Apple Safari</u>, and <u>Microsoft Windows Explorer</u>. In the case of services provided by third parties, you can also exercise your right to object to tracking by informing yourself through the third party's privacy policy, via the opt-out link if explicitly provided in this Cookie Policy, or by visiting the third party's privacy policy directly.

Save for the above, you may also use the information provided by <u>Your Online Choices</u>. Through this service, you can manage tracking preferences for most advertising tools. We recommend that you use this resource in addition to the information provided in this Cookie Policy.

Since the installation of Cookies and other tracking systems operated by third parties through the services used within this Website cannot be technically controlled by the Data Controller, any specific references to Cookies and tracking systems installed by third parties are to be considered indicative. To obtain complete information, consult the privacy policy of any third party services listed in this Cookie Policy.

Given the objective complexity related to the identification of technologies based on Cookies and their very tight integration with the operation of the web, you are encouraged to contact the Data Controller if you would like to receive any further information on the use of Cookies themselves and any possible use of them – for example, by a third party – carried out through this Website.

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

One of the principles applicable to the Processing of your Personal Data concerns the limitation of the retention period, governed by Article 5, paragraph 1, point e) of the Regulation which states "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 organizational measures required by the Regulation to safeguard the rights and freedoms of the data subject".

In light of this principle, your Personal Data will be processed by the Data Controller only as necessary for the purposes set out in this Cookie Policy. In particular, your Personal Data will be stored for a period of time equal to the minimum necessary, as indicated by Recital 39 of the Regulation, i.e., until you revoke your consent where required.

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

As provided by the Regulation, if you have given your consent to the Processing of your Personal Data, you may completely and/or partially revoke it at any time without affecting the lawfulness of Processing based on consent given before the revocation. The methods of revoking consent are very simple and intuitive, you will just need to access the advertising preferences panel or contact the Data Controller and/or each of the third parties as indicated in Section E.

# J. What are your rights?

As provided by Article 15 of the Regulation, you may access your Personal Data, request its correction and update if incomplete or incorrect, request its deletion if collection occurred in violation of a law or regulation, as well as oppose the Processing for legitimate and specific reasons. In particular, below are all your rights that you may exercise at any time against the Data Controller:

- <u>Right of access</u>: You will have the right, under Article 15, paragraph 1 of the Regulation, to obtain from the Data Controller confirmation as to whether or not Personal Data concerning you is being processed, and if so, to gain access to such Personal Data and the following information: a) the purposes of the Processing; b) the categories of Personal Data concerned; c) the recipients or categories of recipients to whom your Personal Data have been or will be disclosed, in particular recipients in third countries or international organizations; d) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the Data concerning the data subject or to object to such Processing; f) the right to lodge a complaint with a supervisory authority; g) where the Personal Data are not collected from the data subject, any available information as to their source; h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the Regulation and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the data subject. All this information can be found within this Cookie Policy which will always be available to you within the Privacy section of each of the Websites.
- <u>Right to rectification</u>: You can obtain, under Article 16 of the Regulation, the rectification of your Personal Data that is inaccurate. Taking into account the purposes of the Processing, you can also obtain the integration of your incomplete Personal Data, even by providing a supplementary statement.
- <u>Right to erasure</u>: You can obtain, under Article 17, paragraph 1 of the Regulation, the erasure of your Personal Data without undue delay and the Data Controller shall have the obligation to erase your Personal Data, should one of the following reasons apply: a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) you have withdrawn consent on which the Processing of your Personal Data is based and there is no other legal ground for the Processing; c) you have objected to the Processing pursuant to Article 21, paragraph 1 or 2 of the Regulation and there are no overriding legitimate grounds for the Processing; d) your Personal Data have been unlawfully processed; e) it is necessary to erase your Personal Data to comply with a legal obligation in Union or Member State law to which the Data Controller is subject.

In some cases, as provided by Article 17, paragraph 3 of the Regulation, the Data Controller is entitled not to erase your Personal Data if their Processing is necessary, for example, for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, for the establishment, exercise or defense of legal claims.

- <u>Right to restriction of Processing</u>: You can obtain the restriction of Processing, under Article 18 of the Regulation, if one of the following applies: a) you contest the accuracy of your Personal Data (the restriction will last for the period necessary for the Data Controller to verify the accuracy of such Personal Data); b) the Processing is unlawful and you oppose the erasure of your Personal Data and request the restriction of their use instead; c) although the Data Controller no longer needs the Personal Data for Processing purposes, the Personal Data are required by you for the establishment, exercise or defense of legal claims; d) you have objected to Processing pursuant to Article 21, paragraph 1 of the Regulation pending the verification whether the legitimate grounds of the Data Controller override yours. In case of restriction of Processing, your Personal Data will be processed, except for storage, only with your consent or for the establishment, exercise or defense of legal claims or for the restriction of the restriction is lifted.
  - <u>Right to data portability</u>: You can, at any time, request and receive all your Personal Data processed by the Data Controller in a structured, commonly used and machine-readable format or request its transmission to another data controller without hindrance. In this case, it will be your responsibility to provide us with all exact details of the new data controller to whom you intend to transfer your Personal Data by giving us written authorization.
  - <u>Right to object</u>: Under Article 21 of the Regulation, you may object at any time to the Processing of your Personal Data if a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) you have withdrawn consent on which the Processing of your Personal Data is based and there is no other legal ground for the Processing; c) you have objected to the Processing pursuant to Article 21, paragraph 1 or 2 of the Regulation and there are no overriding legitimate grounds for the Processing; d) Your Personal Data has been unlawfully processed; e) it is necessary to delete your Personal Data in order to comply with a legal obligation under a community provision or domestic law.

In some cases, as provided for in Article 17, paragraph 3 of the Regulation, the Data Controller is entitled not to proceed with the deletion of your Personal Data if their Processing is necessary, for example, for the exercise of the right to freedom of expression and information, for the fulfillment of a legal obligation, for reasons of public interest, for archiving purposes in the public interest, scientific or historical research or statistical purposes, for the establishment, exercise or defense of a legal claim in court.

To exercise all your rights as identified above, you simply need to contact the Data Controller using the methods indicated in Section E of this Cookie Policy.

We remind you that, at any time, you can also contact the DPO of the Mondadori Group using the contact details provided for in Section E of this Privacy Notice. Furthermore, you have the right to lodge a complaint with the supervisory authority: without prejudice to your right to take action in any other administrative or judicial forum, if you believe that the Processing of your Personal Data carried out by the Data Controller is in violation of the Regulation and/or applicable legislation, you may lodge a complaint with the Data Protection Authority or another competent supervisory authority.

Last modified: May 2024.