

COOKIE POLICY
with regard to personal data protection
Updated to European Regulation for personal data protection n.679/2016,
GDPR and D. Law n.101/2018

In compliance with the provisions of the community regulation (European Regulation on data protection no.679/2016, GDPR) and to the D. Law no. 101/2018, this website www.liburnasds.it respects and protects the confidentiality of the users, by adopting appropriate measures in order not to damage their rights.

This document takes also account of the Recommendation n.2/2001 that the European Authorities for data protection adopted in order to identify the minimum requirements for the data collection online.

This Cookie Policy applies solely to the online activities of this website and it is in force for its users.

PROCESSING LEGAL BASIS

Dati trattati in base al consenso

By using and consulting this site, users directly approve this cookie policy and agree that their personal data are processed with regard to the methods and the aims hereinafter defined, including, if necessary, the potential disclosure to third parties for the fulfilment of a service.

Data and, therefore, Consent provision is totally optional. The user is entitled to negate its consent and/or withdraw it at any moment, through the link at the bottom of this page. Nevertheless, by negating the consent the platform may not be able to provide some services and therefore the browsing experience could be affected. In order to consult the updated Privacy Policy you can check the document on the website www.liburnasds.it .

WHAT ARE COOKIE AND FOR WHAT PURPOSES CAN THEY BE USED

As all the other websites do, this one too uses log files in which **automatically collected information** are filed during the browsing experiences of the users. The aforementioned information can be the following ones:

- internet protocol (IP) address associated to a device used in order to connect;
- browser typology and parameters of the device used in order to connect to the website;
- internet service provider's (ISP) name;
- date and hour of the visit;
- user's web page of origin (referral) and output page;
- possible number of clicks effectuated on the website and possible expressed linking;

As in all of the other websites, this one too uses Cookie, small text files that allow to preserve the information on users' preferences, in order to improve the website's features, to simplify the browsing by automating the procedures (e. g. login, language of the website etc.) and to analyze the use of the website.

A "cookie" is a small text file created by some websites on the user's pc at the moment of the access to a specific website with the aim of filing and transfer information. Cookie are sent by e Web Server (namely the pc in which the website is running) to the user's browser (Internet Explorer, Mozilla Firefox, Google Chrome, etc) and memorized by the latter's pc; suddenly they're sent again to the website at the moment of all the other access.

Some operations couldn't be carried out without cookie, which, in some cases, are technically necessary. In other cases the websites uses cookie in order to facilitate and simplify the browsing or to allow the user to access the services specifically required.

COOKIE CATEGORY	PURPOSES	STORAGE TIME	CONSEQUENCE IF DISABLED
<u>Technical Cookie</u>	Managing the website. They permit the operating as well as the secure and efficient exploration of the website	Valid for the browsing session	Cookie strictly needed for the website's functioning, if you block them the website won't work
<u>Functionality Cookie</u>	Simplifying the browsing and the provided service related to a number of criteria selected by the same	One year maximum	It would not be possible to keep the choices made by the user during the browsing
<u>Analytics Cookie</u>	Collecting information about the browsing in an aggregate form in order to optimize the services browsing	Established by the third party, please refer to the link hereinafter indicated	The Holder won't be able to collect such information anymore.

Cookie may last in the system for long periods and can even contain a Unique Identifying Code. This allows websites that use them, to track the browsing for statistical and advertising purposes with the aim of creating a profile of the user based on the pages consulted and therefore showing him/her specific advertising. (c.d. Behavioral Advertising).

WHAT KIND OF COOKIE ARE USED AND FOR WHAT PURPOSES

This site uses different kinds of technical and functionality cookie.

The Holder, by following the directions provided by the Authority for Data Protection in the General Measure of 8 May 2014, establishes the specific

categories of cookie that can be used, their purposes and the consequences arising from their disablement.

In particular the property cookie used in this website are:

- Fe_session: cookie used in order to memorize the login into the website, furthermore it allows the customer to access personal areas.

STORAGE TIME: 1 browsing session (if the "remember me" option has been disabled); 7 days (if the "remember me" option has been accepted)

- Cb-enabled: cookie used to memorize the acceptance of the use of cookie, by blocking new views of the short Cookie Policy. STORAGE TIME: one year.

- Functionality cookie used by the website are strictly needed in order to use the website, they are linked to a expressly requested feature by the user (e. g. the Login), for which the consent is not required.

COOKIE DISABLEMENT

Cookie are connected to the browser and can be disabled directly through it, by simply refusing or withdrawing your consent.

Users should consider that cookie disablement may affects the correct use of the website; therefore, it won't be possible to access some features, pages or sections of the same and, in this case, FLASHPOINT declines any responsibility. The directions for cookie disablement are better described in the "guide" menu of the browser you're using, from which you can edit your preferences to cookie by following the related links that can be found in the web pages of: Internet [Mozilla Firefox](#) - [Microsoft Internet Explorer](#) - [Microsoft Edge](#) - [Google Chrome](#) - [Apple Safari](#)

You can furthermore activate the option "Do Not Track" in most part of latest generation browsers.

THIRD PARTIES' COOKIE

On this website third-parties' cookie are also operating. Third parties' cookie are cookie created by a website different from the one that the subscriber is currently consulting.

This website acts as **intermediary for third parties' cookie**, used in order to provide further services and features to the users and in order to improve the use of the same website, as specific buttons that refer to Social Medias, or video. This website does not control third parties' cookie in any way, the latter are controlled by the same their parties. Therefore, the information on the use of this kind of cookie and on their aims, as well as the methods for a potential disablement, are directly provided by the third parties hereinafter defined.

Users are informed that this website uses the following services that release cookie: Web analysis service "Google Analytics" provided by Google, Inc.

Google Analytics is a web analysis service that uses cookie in order to enable the website visited to analyze the way users use it. The information created by the cookie on the use of the website by the User (including the IP address), will be submitted to Google and suddenly filed in Google's servers located in the United States. Google will use this information in order to track and examine the website use by the customer, fill reports on the website's activities for the operators, and provide other services related to the website and internet use. In order to consult the privacy information sheet provided by Google and related to Google Analytics, as well as to provide the consent about the cookie' use, please check the following link: <https://www.google.com/policies/privacy/>.

In order to disable such cookie, please follow the directions provided in this link: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=it>

- The DoubleClick service provided by Google, Inc., uses profiling cookie owned by Google in order to improve the advertising. Specifically, it uses cookie for the advertising selection based on what can be appropriate for a user, in order to avoid that the latter views what has previously been shown. Google Doubleclick allows to manage campaigns on third parties' channels, which can in return install profiling cookie. You can de-activate cookie' installed through DoubleClick on the website at any time by disabling DoubleClick through the installation of Google's related plug-in available on the following link:

<https://www.google.com/settings/ads/plugin?hl=it> and by deleting cookie with the browser's settings (please, follow the guidelines in this page), for Flashpoint srl this is technically impossible since they are owned by third parties. For further information, even related to the disablement of the aforementioned cookie, please refer to the following link:

<https://www.google.com/policies/technologies/ads/> .

- the service Google Maps, namely the interactive maps provided by Google, uses cookie that allow the users browsing the website to receive detailed information related to the localization of the company.

Google maps uses several cookie, in the link below you can check Google combined privacy policy that includes information on those cookie that Google Maps can install on your pc or mobile device:

<http://www.google.si/policies/technologies/cookie/> and

<http://www.google.co.uk/intl/en-gb/policies/>

- Profiling Cookie that allow to see where users interact with the website pages:

<https://www.hotjar.com/legal/policies/cookie-information>

DATA TRANSFER TO NON-EU COUNTRIES

This website doesn't transfer the data collected outside the EU.

All of our servers and Processors are located inside the EU, exceptions are the data collected by Google, through its Google Analytics and Google Maps service.

The transfer is authorized by the "Standard Contract Clauses" and other measures as provided by Recommendation n.1/2020 by EDPB.

SECURITY MEASURES AND PROCESSING METHODS

Personal data are processed with automated instruments for the time strictly necessary to fulfill the aims for which they're collected. Specific security measures are fulfilled to prevent data's loss, illegal or illegitimate uses and unauthorized access, as well as encryption and pseudonymization techniques and specific modes of selected data access.

USER'S RIGHTS

Pursuant to the European Regulation 679/2016 (GDPR) and in compliance with the provisions of the Privacy Decree n.101/18, Users are entitled to:

- request confirmation of the personal data filing related to them (right to access);
- know its origin
- receive information related to the logic, the methods and the aims of the processing;
- request updates, rectification, integration, cancelation, transformation in an anonymous form, the block of the data processed by breaching the law including those no more needed for the fulfilment of the aims for which they've been collected;
- in cases of processing based on the consent, receiving by only paying for the support service, the data provided to the Holder of the Processing, and held by the latter, in a correctly structured form that can be read by, and generally used for, an electronic device;

- the right to present a claim to the Data Protection Authority or to the Judicial Authority;

- Pursuant to art. 2l of the Privacy Decree n.101/2018, all the rights (from art.15 to art.22 of EU Regulation) referring to personal data related to dead people, can be exercised by who has reasonable interests or who's acting in order to protect the applicant, as a mandatory, or for family reasons that deserve protection.

-as well as, more generally, exercised all the rights for which he/she is entitled from applicable law.

The requests shall be submitted to the Holder of the processing.

In the case that the data processed are based on **legitimate interests**, the rights of the applicants shall however be ensured (exception is the right of portability that is not required by the regulation), especially the right of objection to processing, that can be exercised by sending a request to the Holder of the Processing. It is possible to object the processing of personal data

a) For legitimate reasons;

b) (without obligation to explain the reasons) when data are processed for marketing or business purposes.

NOTWITHSTANDING THE LIMITATIONS TO THE RIGHTS OF THE APPLICANTS RELATED TO ART. 2j and 2k of the D. Law n.101/2018

HOLDER OF THE DATA POCESSING

The holder of the data processing is the company Flashpoint s.r.l. with registered office in Via Norvegia no.56, Cascina (PI) info@flashpoint srl.com.

RESPONSIBLE FOR POCESSING

In order to know the external and corporate appointed Responsible, the Holder of the Processing refers to the corporate Privacy Policy.