

## Cookie Policy

Cookies are small text files that the web site visited by the user sends to the user's device (normally to the browser), where they are stored so that the device can be recognised the next time the site is visited. At each subsequent visit, the cookies are sent back to the site again by the user's device. Each cookie generally contains: the name of the server from which the cookie was sent; the expiry date and a value, usually a unique number generated randomly by the computer. The server for the web site that transfers the cookie uses this number to recognise the User when the latter returns to the site, or when browsing from one page to another. Not only may cookies be installed by the manager of the site visited by the user (first-party cookies), but also by a different site that installs cookies through the first site (third-party cookies) and is able to recognise them. This happens because the site visited may contain elements (images, maps, sounds, links to the web pages of other domains, etc.) that reside on other servers from that of the site being visited. Generally speaking, cookies are classified into various types based on:

### A. Duration:

- a. session cookies (temporary) which are cancelled automatically when the browser is closed.
- b. persistent cookies which remain active until their expiry date or until they are deleted by the user.

### B. Origin:

- a. first-party cookies sent to the browser directly from the web site that is being visited.
- b. third-party cookies sent to the browser from other sites and not from the web site that is being visited.

### C. Purpose:

- a. technical cookies
  - i. browsing/essential/performance/process or security cookies which help to operate the site, for example allowing browsing between pages or access to protected areas. If they are blocked, the site is unable to operate properly.
  - ii. function/preference/location/status cookies for the session, allowing storage of information that changes the behaviour or appearance of the site (preferred language, size of text and characters, geographic region in which the user is located). If they are blocked, the user experience is less functional but it is not compromised.

iii. a) first-party or b) third-party statistics/analytic cookies with masked IP, without data comparison, with a purpose similar to technical cookies, used to collect information and generate web site use statistics for a better understanding of how users interact with the site.

b) non technical cookies

i. third-party statistics/analytical cookies without masked IP and without data comparison, used to collect information and generate web site use statistics, with the ability to identify and trace the user, for a better understanding of how visitors interact.

ii. profiling/advertising/tracing or conversion cookies to select adverts based on what is most pertinent for a user (customised adverts).

Profiling cookies are designed to create user-related profiles and are used in order to send advertising messages in line with the preferences shown by the user while browsing the internet.

### **Legal basis.**

Pursuant to the contents of articles 13 and 122 of the Italian Legislative Decree dated 30 June 2003 (hereafter the “Privacy Code”), and the contents of the General Provisions by the Privacy authority dated 8 May 2014, together with the provisions of article 13 of EU regulation EU 2016/679 (hereafter the “GDPR”) relating to the protection of individuals regarding personal data processing, without prejudice to the modifications and implementations that may be necessary to adapt the national regulations to EU provisions, and to European or national legislative interventions and/or provisions by the controlling authorities subsequent to publication of this privacy policy. Fom Group s.r.l. with headquarters in Cattolica (RN) via Mercadante 85, data handler, informs users of the web site [www.fom-group.com](http://www.fom-group.com) of the type of cookies used by it and of the purposes for which the information acquired is used, also providing indications on how they can be selected/deselected.

### **Subjects.**

Data Handler Fom Group s.r.l via Mercadante, 85, CAP – 47841 Cattolica (RN). email: [info@fom-group.com](mailto:info@fom-group.com)

Categories of interested Users who make use of the web site

### **Data protection Model.**

In order to comply with the GDPR, Fom Group srl has drawn up a data protection organisational model, identifying roles and responsibilities. The data handler has likewise designated in writing, pursuant to art. 30 of the Privacy Code, the persons responsible for handling personal data, and has provided them with adequate instructions according to their respective areas of responsibility. This is also intended to respond adequately to art. 29 of the GDPR which states that the data handler, or whoever acts on the authority of the latter as personal data handling officer, must not have access to this data unless they have been suitably instructed and trained by the company.

### **Instructions on managing Cookies.**

As indicated above, the owner of the web site has also acknowledged the Provision issued by the Personal Data Protection Authority "Identification of simplified methods for providing information and obtaining the consent to use of cookies - 8 May 2014 (Published in Italian Official Gazette No. 126 dated 3 June 2014)", together with all subsequent provisions by the Authority on the subject of "cookies". Pursuant to this provision, Users are informed that this company web site uses so-called "technical" cookies: these are cookies that are used to allow browsing or to provide a service requested by the user; they are not used for other purposes and are normally installed directly by the web site owner. Without the use of these cookies, certain operations would not be carried out or would be more complex and/or less secure.

Generally speaking, regardless of the type of cookies used by this web site, you are informed that, along with all the safeguards envisaged by current regulations, options are also available for cookie-free browsing, for example:

- Block third party cookies: third party cookies are generally not essential for browsing, so can be refused by default using the specific functions in your browser.
- Activate the option Do Not Track: the option Do Not Track is present in the majority of latest generation browsers. Web sites that are designed to respect this option should automatically stop collecting some of your browsing data when it is activated. However, as mentioned, not all web sites are set up to respect this option (which is discretionary).

- Activate “anonymous browsing” mode: this function can be used to browse without leaving trace of the browsing data in your browser. Web sites will not remember you, the pages you visit will not be stored in the browsing history and new cookies will be deleted. Anonymous browsing does not guarantee your anonymity on the Internet, because it merely serves not to maintain browsing data on your browser. This browsing data will still be available to the web site managers and connectivity providers.
- Eliminate cookies directly: all browsers have specific functions to do this. However, you must remember that every time you connect to the Internet new cookies will be downloaded, so the operation to delete them should be carried out periodically. If you wish, some browsers offer automated systems that delete cookies periodically.

For any further information you may require on the subject of so-called “cookies” please consult the following link:

<http://www.garanteprivacy.it/cookie>. To find out how to restrict, block and/or remove cookies that are set on your device, please visit the following link: <http://www.aboutcookies.org>

### **How to manage cookies on your PC**

The following indicates some examples of the steps to follow to check whether or not cookies have been enabled on the most common web browsers. The user may also decide whether or not to disable cookies in the same sections of the web browser.

#### **Google Chrome**

1. Access “Settings” using the button at the top of the browser window.
2. Open the section “advanced” and find the section “Privacy and security”.
3. Access the “browsing content settings” section and then the section relating to cookies.

#### **Microsoft Edge**

1. Access “Settings” using the button at the top of the browser window.
2. Click on “show advanced settings” and find the section “Privacy and services”.
3. Access the section relating to cookies.

#### **Mozilla Firefox**

1. Access “Options” using the button at the top of the browser window.
2. Access the section on “Privacy and security”.
3. Access the section relating to cookies.

### **Duration of cookies**

Unlike session cookies, which only remain active until the browser is closed or the user logs out, other cookies “survive” closure of the browser and are still available the next time the user visits the web site. These cookies are known as persistent cookies and their duration is set by the server when they are created: it may vary from a few minutes, to days or even several years.

### **Third party cookies**

The company has not stipulated agreements with third parties for the installation of cookies through this site. Links to third party sites are present on the Portal in order to carry out the authentication and payment service, and cookies may be generated when these sites are accessed. The policies relating to third party cookies are under the control of the relevant site manager, who should be contacted for further information.

### **AdWords Remarketing (Google LLC or Google Ireland Limited)**

Remarketing with Google Analytics is a remarketing and behavioural targeting service provided by Google LLC or by Google Ireland Limited, according to where this Application is used, which connects the tracing activity carried out by Google Analytics and by its Cookies to the Google Ads advertising network and to Cookie Doubleclick.

Handling site: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy

### **Remarketing with Google Analytics for display advertising (Google LLC or Google Ireland Limited)**

Google Analytics for display advertising is a remarketing and behavioural targeting service provided by Google LLC or by Google Ireland Limited, according to where this Application is used, which connects the tracing activity carried out by Google Analytics and by its Cookies to the Google Ads advertising network and to Cookie Doubleclick.

Personal Data collected: Cookies and Data on usage.

Handling site: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy.

### **Statistics cookies: Google analytics**

Deactivating third party cookies may in certain cases prevent tracing by advertisers, for further information please refer to the web site [AboutCookies.org](http://AboutCookies.org).

For further information on activity tracing by advertisers, on the use of third party cookies present on this site and for their privacy policies, please refer to the following links:

Google Adsense: <http://www.google.com/policies/technologies/ads/>

Google Analytics : [https://www.google.com/intl/it\\_ALL/analytics/learn/privacy.html](https://www.google.com/intl/it_ALL/analytics/learn/privacy.html)

The cookie used by Google Analytics involves anonymisation of the user IP.

This is a web analysis service provided by Google Inc. (“Google”) which uses cookies that are stored on the user’s computer to allow statistical analysis in aggregate form regarding use of the web site visited.

The Data generated by Google Analytics is stored by Google as indicated in the Privacy Policy, which can be found using the following link: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

If you wish to consult the privacy policy of Google Inc., the independent data handler for the Google Analytics service, please refer to the Internet site : <http://www.google.com/intl/en/analytics/privacyoverview.html>

The following link <https://tools.google.com/dlpage/gaoptout?hl=it> also contains the additional browser component to deactivate Google Analytics, which has been made available by Google.

The list of third parties may be updated.

Web sites may use third party cookies for purposes not necessarily connected to privacy, and deactivating them may interfere with proper operation of those sites.

Origin: <http://www.google-analytics.com/analytics.js>

First name	Supplier	Purpose	Expiry
_ga	Fom-group.com	Registers a unique ID used to generate statistical data on how the visitor uses the web site.	2 years
_gat	Fom-group.com	Used by google analytics to limit the frequency of requests	session

_gid	Fom-group.com	Registers a unique ID used to generate statistical data on how the visitor uses the web site.	session
_collect	Google analytics	Used by goggle analytics	session

## Management of Cookies by the user

Users can decide whether to block, restrict or accept cookies, using the settings on their browser.

The most popular browsers allow you to create configuration settings that will remove both “proprietary” and “third party” cookies.

For information on how to manage cookies (enable/eliminate) it is recommended you refer to your browser’s user manual, by clicking on “Help” in the menu or searching on line on the relevant manufacturer’s web site.

By using the portal without modifying the browser configuration to disable cookies, the user implicitly accepts the cookies that will be installed on the device.

It is important to stress that total or partial disabling of technical cookies may compromise the Portal functions.



If cookies are blocked, the Company does not guarantee that the site will operate properly. Furthermore, the company shall not be liable in any way for damage suffered to the user as a result of malfunction of the Portal connected to the removal of cookies originating from the web site.

**Further information**

For further information on cookies and how to manage them, please consult the web site [AboutCookies.org](http://AboutCookies.org)