

Privacy policy for visitors to the websites using "ShinyStat Services"

Cookie policy

Pursuant to articles 13 and 14 of EU Regulation 2016/679 of 27 April 2016 ("Regulation" or "Applicable Law"), as the data processing controllers, we would like to provide suitable information on the basic elements of the processing performed by us.

This information is for VISITORS to the websites using Analytics and Marketing Automation ShinyStat™ Services.

Dear Visitor (hereinafter, "**You**" or the "**User**"),

This page is owned by **Sevendata S.p.A.**, with registered office in Milan, Corso di Porta Nuova no. 48, 20121 (MI) ITALY, Tax Code/VAT number 10107290966, (hereinafter, "**Sevendata**", "**Us** or the "**Company**").

Our Company provides Analytics services to optimise user use of a website and Marketing Automation systems to streamline the supply of content and messages related to navigator profiles, and the supply of advertising messages.

We therefore have a role as a **third party related** to the website you are currently coming from (hereinafter the "**Source Website**").

As so-called cookies for sundry purposes are sent through our services, this information notice explains what cookies are and how they are used by Us.

Through the cookies transmitted and controlled by Us, the Company collects and processes some personal data concerning you, as **party in charge** of processing on behalf of the manager of the Source Website or, for profiling cookies, as **co-controller** of processing jointly with the manager of the Source Website.

Pursuant to art. 13 of EU Regulation 2016/679 of 27 April 2016 related to the protection of natural persons for what concerns the processing of personal data (hereinafter, "**Regulation**") and Legislative Decree 196/2003 (hereinafter, "**Privacy Code**" and, with the Regulation, "**Applicable Laws**"), this information notice will explain how these data are collected, for what purposes and what your rights are.

If you do not know what cookies are, please read this information carefully so you are aware of the choices you make. The Company has maximum consideration for the right to privacy and the protection of the personal data of its Users.

To exercise their rights and for any information or clarification on the processing described in this information notice, the data subject may, at any time, contact

SevenData S.p.A., with registered office in Corso di Porta Nuova 48, 20121, Milan (MI), tax code and VAT number 10107290966, writing to the **Data Protection Officer** of the Company, at the e-mail address dpo@sevendata.it.

A. What are cookies and what are they for

Cookies are small text files that the websites visited by users send directly to their computers (normally to the browser), where they are memorised to then be retransmitted to the same websites the next time the same user visits them (so-called **own first party cookies**).

While navigating a website, the user's computer could also receive the cookies of different websites or web servers (so-called **third party cookies**); this happens because the website visited could contain elements such as images, maps, sounds, specific links to the web pages of other domains present on different servers to the one where the page required is located. In other words, those are cookies set by a website that is not the one being currently visited.

Cookies may last for just a single navigation session on the browser (so-called **session cookies**) and, in that case, they are deactivated automatically when the user closes the browser; or can last for a preset expiry period and, in that case, will remain memorised and active on the user's hard disk until that expiry date, continuing to collect information during the different navigation sessions on the browser (so-called **permanent cookies**).

Cookies are used for different functions. Some are needed to allow you to navigate a website and use its functionalities (so-called **technical cookies**). Others are used to obtain statistics on the number of users entering the website and on how the website is used (so-called **analytics cookies**). Lastly, others are used to track your consumer profile and show you adverts on websites that could be of interest to you, as they are in line with your consumer tastes and habits (so-called **profiling cookies**).

That is why, on entering the Source Website, you are shown a specific *banner* (also called *Consent Management Platform*; hereinafter, "**CMP**") informing you that with consent, the Source Website uses cookies that do not have technical purposes and that by pressing a specific button you can consent to the use of cookies.

For more detail on the different cookie categories, carry on reading this information notice. Learn how they work and what they are for and choose freely whether to consent to their use or block it.

B. "Analytics" cookies

Analytics cookies are used to collect statistics on the number of users accessing the service. As **processors**, we collect this information on behalf of the owners of the Source Website who have stipulated an agreement with the Company to use the **ShinyStat™ Analytics platform** (hereinafter the "**Platform**").

The Company uses the Platform to install the Analytics cookies through the Source Website. Through the Platform, we do not file any personal data in clear text (for example the full IP address) as we apply, in real time (within a few milliseconds of collection), data minimisation measures which significantly reduce the identification power of those cookies, making it impossible to identify you in the reports made available, in aggregate, anonymous format, for the manager of the Source Website. To learn more about the data anonymisation process and analytics cookies we kindly ask you to read here: www.shinystat.com/it/anonimizzazione.html.

The Company does not cross-reference the information contained in those cookies with other information it has available.

You are naturally free to block the installation of analytics cookies at any time, without in any way compromising the possibility to visit the Source Website. You can, in fact, Opt-Out by clicking on the button available in the tables contained in this information.

The Company does not collect any statistics on those who Opt-Out. If you use different browsers or devices to access the Source Website (computer, smartphone, tablet, etc.), you need to Opt-Out for each browser on each device for which you want to deactivate the analytics cookies released by the Company.

On using the interactive button to block the Company's cookies, you will still receive a technical cookie to memorise the preference expressed. On deleting all cookies from the browser, this technical cookie could also be removed so you might need to express your choice to block these cookies again by using the interactive Opt-Out button reached through the link indicated in this information.

The **technical cookie** used for that purpose by Sevendata is the following:

Cookie	Characteristics	Functionalities	Opt-out
OPTOUT<	<ul style="list-style-type: none"> - Functionality cookies - Permanent - Anonymised 	Inhibits the acquisition of Analytics data	Opt-Out: www.shinystat.com/it/opt-out.html

The Platform uses the following **anonymised** analytics cookies (hence installed through the Source Website without your prior consent):

Cookie	Characteristics	Purposes	Opt-Out instructions
SN_<xxx	<ul style="list-style-type: none"> - Cookie Analytics - Permanent - Anonymised 	Detection of visit frequency, returning visits and visitors	Opt-Out: www.shinystat.com/it/opt-out.html
SSCN_[N UG UW UM]<xxx	<ul style="list-style-type: none"> - Cookie Analytics - Permanent - Anonymised 	Unique identifier detection for website channels	
SSC_<xxx	<ul style="list-style-type: none"> - Cookie Analytics - Permanent - Anonymised 	Detection of data Conversions cart	
SUID_<xxx	<ul style="list-style-type: none"> - Cookie Analytics - Permanent - Anonymised 	Unique anonymised visitor identifier	
SSBR[AGMS]<xxx	<ul style="list-style-type: none"> - Cookie Analytics - Permanent - Anonymised 	Management Absolute Unique identifier anonymised Brand Video Analytics	
SSBW_<xxx	<ul style="list-style-type: none"> - Cookie Analytics - Permanent - Anonymised 	Management Absolute Unique identifier anonymised Video Analytics	

Cookie	Characteristics	Purposes	Opt-Out instructions
flsuuv_xxx	- Cookie Analytics - Permanent - Anonymised	Management Unique identifier anonymised Video Analytics	Opt-Out: www.shinystat.com/it/opt-out.html
SSID_xxx	- Cookie Analytics - Permanent - Anonymised	Unique identifier anonymised by session	
SV_xxx	- Cookie Analytics - Permanent - Anonymised	Anonymised visit identifier	
brand_xxx	- Cookie Analytics - Permanent - Anonymised	Anonymised Session identifier Brand Video Analytics	
data_creazione_xxx	- Cookie Analytics - Permanent - Anonymised	Session Creation Date VideoPlay	
isessionusr_xxx	- Cookie Analytics - Session - Anonymised	Anonymised unique identifier Video Analytics	
AFF[[_V _S _UG _UW _UW]_xxx	- Cookie Analytics - Permanent - Anonymised	Management Unique identifier anonymised video advertising	
CAP_nnn	- Cookie Analytics Permanent - Anonymised	Management video advertising frequency	

Cookie	Characteristics	Purposes	Opt-Out instructions
trgg_XXX	- Cookie Analytics - Permanent - Anonymised	Anonymised information on the current visit	Opt-Out: www.shinystat.com/it/opt-out.html
trggds_XXX	- Cookie Analytics - Permanent - Anonymised	Date engagement management	
trggpu_XXX	- Cookie Analytics - Permanent - Anonymised	Management dates of next exit engagement	
trggvv_XXX	- Cookie Analytics - Permanent - Anonymised	Count of engagement displays	
trgguid_XXX	- Cookie Analytics - Permanent - Anonymised	Id for relations with conversions	

The analytics cookies used by Sevendata listed above **last maximum 6 months**.

C. Profiling cookies

The Sevendata **profiling** cookies are installed through us when you visit the Source Website.

This solely in the case when the configuration panel of the account of the Platform of the manager of the Source Website (ShinyStat Customer):

1. has an active set of "**Optional Functionalities**" of the **analytics** services (that the Source Website manager has the right to activate or deactivate at any time, at its discretion and autonomously), that enable, thanks to the "ShinySense" DMP of Sevendata, **creation of aggregated reports on the users of the Source Website, divided by socio-demographic or of interest clusters** and, possibly,
2. the manager of the Source Website has also activated the **Marketing Automation** functionalities offered by the Platform, in order to personalise marketing contents and actions based on the navigation methods that the Source Website visitors have displayed on the network of websites on which Sevendata is authorised to carry out profiling.

If the set of "Optional Functionalities" or the Marketing Automation services are not active, the Company will limit itself to issuing, on behalf of the Source Website manager, the Analytics cookies described in the preceding paragraph. You could find evidence of any activation of these functionalities from the extended cookie information of the Source Website.

As envisaged by privacy regulations in force, your prior **consent** is required to install those cookies. That is why a specific banner/CMP is displayed when you enter the Source Website. This informs you that (i) profiling cookies are used on the Source Website and that (ii) pressing the button found you can consent to the use of those cookies.

If you should consent to the installation of cookies by that method, the Source Website controller will keep track of your consent through a specific technical cookie. In this way, the cookies banner will not be displayed again during your next visits to the Source Website. Would you kindly consider that, if you eliminate this technical cookie from your browser using the methods in paragraph D below, your consent tracking would be lost so the cookie banner would be displayed again at your next visit to the Source Website.

You are naturally free to block installation of profiling cookies at any time, without in any way compromising the possibility to visit the Source Website and use its contents. If you decide to deactivate the behavioural advertising, it does not mean you will no longer receive advertising on the Source Website. However, what you receive might not reflect your interests or your preferences on the browser you are currently using. **By deactivating the Sevendata profiling cookies it will no longer be possible for the Source Website manager to use the data from your navigation in order to create socio-demographic reports and divided by interest of users of the Source Website.**

Sevendata guarantees that use of data collected through profiling cookies will only take place inside the Platform systems and for the Source Website manager (who will only see those data in aggregated format), through technological systems managed by Sevendata itself to supply its services and those data will in no way be transferred to third parties.

The profiling cookies released by the DMP "ShinySense" are permanent and **last maximum 6 months**.

Here below please find a list of those cookies, with indication of how it is possible to object to their installation:

Name of the Cookie	Cookie Category	Opt-Out instructions
SSA	- profiling cookies - permanent - anonymised	Opt-Out: www.shinystat.com/it/opt-out.html

To disable these profiling cookies modify your browser settings (see **paragraph D, no. 1**) or use the Opt-Out link. Using the link to block the profiling cookies you will still receive a technical cookie to memorise your preference, indicated in paragraph B above.

We kindly ask you to consider that, by cancelling all browser cookies, this technical cookie could be removed so you could have to make your choice to block these cookies once again by using the Opt-Out link present in this information or the CMP made available by the Source Website manager.

We do not transmit profiling cookies installed by third parties that act as autonomous controllers (third party cookies).

C.1 Relations between Sevendata S.p.A. and the manager of the Source Website with reference to cookies released by the ShinySense DMP

Together with the manager of the Source Website, Sevendata is **co-controller** of processing, pursuant to art. 26 of the Regulation, related to personal data of users collected through the “**ShinySense**” DMP (whose specifications are indicated in the previous paragraph).

With an internal agreement, the manager of the Source Website and Sevendata establish the respective responsibilities on compliance with the obligations from laws applicable, with specific reference to exercising the rights of the Data Subject, and the respective functions of communication of information pursuant to articles 13 and 14 of the Regulation.

Therefore, here below, in compliance with art. 26 GDPR, please find the essential content of the agreement between the two co-controllers: i) the processing co-controllers are the manager of the Source Website and Sevendata; ii) Sevendata has identified a Data Protection Officer (DPO) whereas, to check whether the Source Website manager has appointed a DPO, please read the full cookie information notice of the Source Website; iii) the personal data are collected through the DMP, “ShinySense”, for advertising profiling purposes, creation of profiled and aggregated reports and possible marketing automation services (as better indicated in the previous paragraph); iv) the processing of the personal data in question will take place solely in a European Union Member State (Italy); v) the personal data collected will be stored for the time indicated in the previous paragraph.

The contact point for the data subjects for all processing conducted together by the manager of the Source Website and Sevendata is represented by the DPO of Sevendata, who can be contacted at any time by the data subjects at the following e-mail: dpo@sevendata.it. Regardless of all that, please remember that the latter’s data subjects may exercise their rights with and against each processing co-controller. They can therefore contact Sevendata at the contact details indicated in the introduction to this information notice, or the manager of the Source Website, at the details indicated in the full cookie information notice of the Source Website.

D. How to manage cookies and oppose their use

There are several options for managing, disabling and cancelling cookies.

1. Change your browser settings

Follow the instructions provided by the producer of the browser you use to manage, disable or cancel all cookies:

- **Explorer:** <http://windows.microsoft.com/it-it/windows-vista/block-or-allow-cookies>
- **Chrome:** https://support.google.com/chrome/answer/95647?hl=it&p=cpn_cookies
- **Firefox:** <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>
- **Safari:** <https://support.apple.com/it-it/guide/safari/manage-cookies-and-website-data-sfri11471/>
- **Opera:** <https://help.opera.com/en/latest/web-preferences/>

Make your choices carefully. By blocking receipt of cookies indiscriminately, including technical ones, without providing for a specific exception for the Source Website, you might no longer be able to navigate the Source Website or use all or part of its functionalities. Moreover, by cancelling all browser cookies, the technical ones could be removed so you could remove the preferences that you set when using the Source Website.

2. **Use our interactive instruments**

To disable the Sevensdata cookies, you just need to use the opt out links highlighted in paragraphs B and C above. Your choice to oppose use of these cookies will have no consequences on being able to navigate the Source Website and use its functionalities, and can be revoked by you at any time using the same interactive button.

3. **Use the website www.youronlinechoices.eu/it/**

Your Online Choices is a Website managed by the non-profit association *European Interactive Digital Advertising Alliance* (EDAA); its Italian version can be reached from www.youronlinechoices.eu/it/, and provides information on the behavioural advertising based on profiling cookies (<http://www.youronlinechoices.com/it/a-proposito>); it enables Internet users to easily refuse (opt- out) installation of the main profiling cookies installed by advertisers and used on Websites(<http://www.youronlinechoices.com/it/le-tue-scelte>). Before using this instrument, we recommend carefully reading the general conditions of service of the website Your Online Choices (<http://www.youronlinechoices.com/it/condizioni-general-di-servizio>), the frequent questions (FAQ) (<http://www.youronlinechoices.com/it/faqs>) and the user guide (<http://www.youronlinechoices.com/it/help>).

Use Your Online Choices in an aware manner. Even though Your Online Choices brings together many of the most important companies in the advertising world that use cookies, some of the third parties installing cookies through the Source Website might not have adhered to Your Online Choices. So use of Your Online Choices does not guarantee that you receive third party cookies when navigating the Source Website. Please also remember that by eliminating all the cookies from your browser, even the technical ones released by Your Online Choices to remember your choices could be eliminated, making the third party cookies active again.

4. **Use the CMP**

For the processing of personal data which, with prior User consent, third party companies could implement through cookies, the User can also use the CMP implemented on the Source Website, for the provision or revocation of consent following the relative indications.

E. Processing method and data retention times

As was pointed out in the introduction to this information notice, the Company could collect and process some of your personal data through the cookies it transmits directly on the Website.

The data will only be processed, using the anonymisation techniques specified in this information notice, using electronic instruments in a fully automated way and with no human intermediation.

Our employees and collaborators will never access the content of your personal data obtained through cookies; this means they will never be able to access and/or have the PII (Personally Identifiable Information), that is the information through which they could identify you directly.

Some of our employees and collaborators, appointed by us as authorised Processors, could perform maintenance on the computer systems hosting your data, without being able to access their effective content.

We would like to inform you that, in compliance with the presuppositions and guarantees established by the Regulation, with reference to the data detected by the cookies released while using the Platform, they will not be transferred by Sevensdata to Countries not belonging to the European Economic Area. The Company also guarantees that your personal data will not be communicated to third party processing controllers nor will they be disseminated.

Your personal data will be stored for the times indicated in the above paragraphs and relative descriptive tables.

F. Your rights

To exercise your rights, or obtain more information or clarification on this Cookie Information Notice, would you kindly contact the Company by the following means:

- Sending a registered letter with return receipt to the registered office of the Controller (Corso di Porta Nuova no. 48, 20121 Milan (MI) - Italy);
- Making a request through the following **webform**:
[https:// www.shinystat.com/it/legalinfo.html](https://www.shinystat.com/it/legalinfo.html)

It is also possible to contact the Person responsible for data protection (RPD or DPO) for the Controller, whose contact data is provided below: dpo@sevendata.it

Pursuant to the Applicable Regulations, Users have:

- a. the **right to revoke consent** at any time, if processing is based on their consent;
- b. the **right of access** to personal data;
- c. (where applicable) the **right of data portability** (right to receive all the personal data concerning them in a structured, commonly used format readable by an automatic device), the **right to limit processing** of personal data, the **right of rectification** and the **right of erasure** (“right to be forgotten”);
- d. the **right to object**:
 - i. fully or partially, for legitimate reasons, to the processing of personal data concerning them, even if pertinent to collection;
 - ii. fully or partially, to the processing of personal data concerning them to be sent advertising or direct sales material or to carry out market or commercial communication surveys;
- e. if they feel processing concerning them breaches the Regulation, the **right to lodge a complaint with a control Authority** (in the member State where they currently live, where they currently work or where the presumed breach took place). The Italian control Authority is the Privacy Authority with registered office in Piazza Venezia, no. 11, 00186 - Roma (RM) (<http://www.garanteprivacy.it/>).

The Company can modify this privacy information based on regulatory, legal needs, or in order to adapt the information to instructions issued by the competent Authorities. **All the revisions that could imply substantial changes to processing will be notified to Users through updating pop-ups on the Shinystat websites.**

Furthermore, the Company is not responsible for the update of all links viewable in this Information notice; so each time a link is not working and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites recalled by that link.