

## COOKIE POLICY

### What are cookies, what are they used for, and who installs them?

Cookies are small text strings that websites you visit send to your device (e.g., PC, tablet, smartphone...), where they are stored and/or read by the browsing browser. They allow the browser to send information to those who have installed the cookies in order to provide you with optimal navigation, generate visit statistics, offer personalized content, and targeted advertising. Cookies are embedded in various elements hosted on the website page itself (such as advertising banners, images, videos, etc.).

During your navigation on this website, you may receive the following cookies on your device:

- **First-party cookies:** these are cookies sent by the website owner you are visiting,
- **Third-party cookies:** these are cookies sent by a website different from the one you are visiting, which installs its own cookies through the website of the owner.

The management and responsibility for first-party cookies lie with the owner, while regarding third-party cookies, the owner has no control over the activities of the third party or the possibility that it may modify them over time. In relation to third-party cookies, the owner acts as an intermediary and, as such, refers to the disclosure provided by the third party, accessible via a specific link next to each cookie indicated in the dedicated area reachable from the banner or located at the bottom.

**Other tracking tools.** Similar to cookies, other tracking tools are being developed that serve the same purposes. These tracking tools can be classified according to various criteria; however, the main grouping criterion remains the purpose for which they are used: either technical or commercial in nature. Among these tools are, for example, pixels, fingerprinting tools, etc.

### a) *What is the purpose of this Cookie Policy?*

In compliance with the current regulations on the protection of personal data (particularly the Regulation (EU) 2016/679 on the protection of personal data "GDPR" and the European and Italian legislation on cookies), we would like to inform you about the processing of your personal data collected through cookies (and possibly other tracking tools assimilated to them), including third-party ones.

The processing will be based on the principles of fairness, lawfulness, and transparency, as well as the protection of your privacy and your rights.

### b) *Who is the Data Controller? How to contact him or her?*

The Data Controller is Balsamo S.r.l. with its registered office in Piazza Pieve, 1D - 24060 Casazza - BG, C.F./P.IVA 04274420167, hereinafter the "Data Controller". The contact details are: [privacy@balsamo.care](mailto:privacy@balsamo.care).

### c) *What cookies does this site use? For what purposes, on what legal basis? Is it obligatory to provide the data? What happens if you do not provide it?*

The cookies used by this site can be classified into the following categories: 1) Technical cookies, which are necessary for the functioning of the site, and 2) Profiling cookies, which are used to track user's behavior for analysis in order to provide services based on his or her preferences. Below are the relevant details:

#### 1. Technical Cookies, which do not require your consent:

This category includes the cookies listed below, which serve the respectively stated purposes:

- **Navigation or session cookies**, which ensure the normal navigation and use of the website (for example, enabling a purchase or logging in to access reserved areas),
- **Anonymous analytics cookies**, these are cookies used to collect information in an aggregated form, not attributable to an individual, regarding the number of users, the most visited pages, the locations from which users connect, etc. This is done to generate statistics on the service and website usage. These cookies may also be third-party cookies. However, the Data Controller must have anonymized them (e.g., by anonymizing the IP or masking

part of it) and must not allow the third party to cross-reference the information collected through the site with other information already in their possession.

- **Functionality cookies**, which enable user navigation based on selected criteria (e.g., language, products selected for purchase) to improve the service provided.

• **Legal basis.** For technical cookies, the legal basis lies in the execution of a contract or pre-contractual measures (Art. 6.b of the GDPR) as they are necessary to make the site and the requested service usable by users. The use of such cookies does not require your consent.

• **Necessity of proving Data and consequences.** Providing data collected through the described cookies is not obligatory; however, it is necessary for connecting to the site and providing the service. In the absence, either partial or total, of such provision, the site cannot be used, or there may be issues with its usage. The list of Technical Cookies used by this site with their characteristics (e.g., features, data retention times, etc.) is available in the dedicated area reachable from the banner or located at the bottom.

## 2. Profiling cookies and other tracking tools requiring your consent:

**Profiling cookies and other tracking tools can be:**

- **First-party:** Installed directly by the Data Controller on their own site.

- **Third-party:** Installed on the Data Controller's site by a third party. Regarding third-party cookies and other third-party tracking tools (e.g., Facebook pixel, social plug-ins, fingerprinting tools, Google Tag, etc.), the Data Controller has no control over the activity and purposes of the third party, nor the possibility that it may modify them over time. In this sense, the Data Controller acts as an intermediary. In this capacity, they refer to the third party's information, accessible via the link next to each cookie indicated in the dedicated area reachable from the banner or located at the bottom.

Profiling cookies and other tracking tools allow the automated tracking and tracing of user behavior during their internet browsing. They aim to attribute specific actions or recurring behavioral patterns in the use of offered functionalities (patterns) to identified or identifiable individuals. This facilitates grouping different profiles into homogeneous clusters of varying sizes, allowing the Data Controller or third parties, among other things, to customize the service beyond what is strictly necessary for service provision. It also enables sending targeted advertising and marketing messages, i.e., in line with user preferences expressed during online browsing.

Profiling cookies also include non-anonymized analytics (statistical) cookies used by third parties when the Data Controller has not anonymized them (e.g., has not anonymized the IP) or when it allows the third party to cross-reference the collected information with other information already in their possession.

• **Legal basis.** The use of profiling cookies (including non-anonymized analytics) and other tracking tools can only occur with your consent, which constitutes the legal basis for processing data collected through such cookies, in accordance with Article 6.a of the GDPR. Consent can be given or revoked by you at any time by directly accessing the dedicated area reachable from the banner or located at the bottom.

• **Necessity of providing Data and consequences.** The failure to provide data resulting from your lack of consent for such cookies and other tracking tools has no consequences for you in terms of browsing the site and using its features. However, it results in the inability to present you with advertising messages on services and goods in line with your preferences and actual interests expressed during your online browsing.

### *d) Are personal data transferred outside the European Union (EU)?*

Some collected data may be transferred abroad to locations outside the European Union. However, this transfer will be carried out in compliance with the guarantees prescribed by the GDPR for such activities (Articles 45 to 49). These may include: transfer to companies located in countries for which the existence of guarantees for the protection of personal data equivalent to those of the GDPR is recognized (Countries on the White List); or transfer to companies with which specific contractual clauses for the protection of personal data have been signed, approved by the Guarantor Authority, or binding corporate rules approved by the Guarantor Authority. Alternatively, the transfer may occur based on specific derogations. For more information, you can contact the Data Controller as indicated in the section below titled "*What are your rights as the data subject?*".

### *e) How long is the data stored?*

The retention period for data collected through the use of cookies is indicated in the lists of cookies used by this site, available in the dedicated area accessible at the bottom.

#### *f) Who can access your data? To whom do we disclose it?*

The data collected through cookies:

- **Authorized:** may be used by authorized collaborators of the Data Controller, such as those responsible for the maintenance and management of the website, marketing, and administration,
- **Processors:** may also be used by any third parties (service providers, IT infrastructure providers involved in the management and supervision of the site, etc.) operating on behalf of the Data Controller and duly appointed as data processors in accordance with Article 28 of the GDPR,
- **Independent Controllers:** furthermore, the data may be transferred to third parties authorized by law to access your data, such as law enforcement and public authorities.

#### *a) What are your rights as a person concerned?*

The GDPR grants you the following rights in relation to your personal data, which you may exercise to the extent and in accordance with the provisions of the legislation:

- Right of access to your personal data (art. 15),
- Right to rectification (art. 16),
- Right to erasure (right to be forgotten) (art. 17),
- Right to restriction of processing (art. 18),
- Right to data portability (art. 20),
- **Right to object (Art. 21);** the data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her based on legitimate interest, including profiling on the basis thereof. The Data Controller shall refrain from processing unless it demonstrates the existence of compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject or for the assessment, exercise or defense of a right in legal venue,
- Right to object to a decision based solely on automated processing (Art. 22),
- Right to revoke, at any time, the consent given, without affecting the lawfulness of the processing based on the consent given before revocation.

You may exercise these rights by sending a request through the channel made available by the Data Controller as indicated above. In addition, you have the right to lodge a complaint with the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) for the protection of your personal data, if you believe that the processing of your data is contrary to the regulations in force (art 77) or to take legal action (art 79).

#### *b) How is personal data protected?*

Personal data will be processed both by electronic and non-electronic means, using technical and organizational security measures appropriate to the nature of the data to ensure its integrity and confidentiality and protect it against the risks of unlawful intrusion, loss, alteration, or disclosure to third parties not authorized to process it.

#### *g) Social plug in*

We inform you that on the pages of our website you visit, plug-ins provided by third parties (e.g., like buttons, comments, share buttons, and other functions typical of social networks and platforms such as Facebook, Instagram, Youtube, LinkedIn, Twitter, Snapchat, etc.) may be installed.

These plug-ins will allow your browser to call content from the plug-in provider and transfer personal data concerning you (including, for example, visited pages, purchases made, dwell time, device and browsing identifiers, likes, comments, shares, etc.) to them. This activity involves the installation of cookies and tracking tools that will require your consent, which you can express as indicated in the cookie management area.

Once you land on the website of the social network providing the plug-in, the processing will be entirely carried out according to the privacy policy published by that entity.

#### *h) Remarketing*

##### *Data and data source*

You may have landed on this website/app by clicking on links or advertisements from the Data Controller present on third-party websites or social networks. In this case, the third-party website will send us some personal data (IP

address and other identifiers, referring site, advertising campaign, campaign statistics, etc.) related to your interest in our advertising.

If you have provided valid consent, we may use this information to send you our advertising or promotional communications.

### ***Joint Ownership of the Campaign***

If the remarketing advertising campaign on which you clicked was carried out on the Facebook platforms (Facebook, Instagram, and apps participating in the Facebook Audience Network) or through its tools (Facebook stories, Instagram stories, Messenger stories, news feed, feed, marketplace, video, etc.), the processing related to target selection and the choice of methods for sending campaign content has been (and will be) carried out jointly with Facebook Ireland Limited (hereinafter "**Facebook**"), located at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2.

### ***Elements of the agreement***

**Facebook:** Every detail regarding the joint ownership agreement and respective responsibilities is available at the following link: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). Below is the link to Facebook's privacy policy: <https://www.facebook.com/about/privacy>. Facebook will be responsible for managing requests to exercise the rights of data subjects under Articles 15-20 of the GDPR regarding personal data stored by Facebook after the joint processing.

The activities of sending promotional content on the websites, apps, or platforms of third-party joint controllers or their partners will be carried out by them only if you have provided the necessary consents. Our relevant information is provided to you through this document when you connect to our website/app.

### ***i) Updates***

The Data Controller reserves the right to modify and update this information at any time. Changes will be effective upon their publication.

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