

TERMINAL ONE: COOKIE POLICY

TERMINAL ONE S.p.A., (Tax Code and VAT Number: 02776300358) (hereinafter "T1"), represented by its pro tempore legal representative, with its registered office in Reggio Emilia, via G. Gutenberg, 3, acting as the Data Controller pursuant to Articles 4 no. 7) and 24 of EU Regulation no. 2016/679 (GDPR), hereby presents the cookie policy (Policy) related to the website www.terminalone.it (Site).

1- Legal Framework of Reference.

1.1. - The Policy is based on the following European and/or national legislative measures (of first and/or second level): (i) Directive no. 2002/58/EC of 12.7.2002 (ePrivacy Directive), as amended by Directive no. 2009/136/EC; (ii) Article 122 of the amended Legislative Decree no. 196/2003 (Privacy Code), which transposed the ePrivacy Directive into national law; (iii) GDPR: Articles 4 no. 11), 7, 12, 13, 25, and 95 (in particular, also considering Recitals no. 30, 32, and 173); (iv) Guidelines no. 5/2020 adopted on 4.5.2020 by the EDPB, replacing the Guidelines of 10.4.2018 signed by the WP Art. 29; (v) Decision no. 231 of 10.6.2021 [web document no. 9677876] signed by the Italian Data Protection Authority (Garante Privacy); (vi) Recommendation no. 2/2001 by the WP Art. 29; (vii) Opinion no. 2/2010 by the WP Art. 29; (viii) Opinion no. 4/2012 by the WP Art. 29; (ix) Guidelines no. 8/2020 by the EDPB.

2 - Cookies and Other Tracking Tools: Definition and Classification.

2.1. "Cookies"¹ are typically strings of text that a website ("publisher" or "first-party") visited by the user or a different website ("third-party") positions and stores, either directly (in the case of a first-party website) or indirectly (through the latter, in the case of a third-party website), within a terminal device under the user's control. In this regard, the Italian Data Protection Authority (Garante Privacy) has specified that the information encoded in cookies can include both personal data as defined in Article 4 no. 1) of the GDPR (e.g., IP address; username; email address; unique identifier) and non-personal data as defined in Article 3 no. 1) of EU Regulation no. 1807/2018 (e.g., language; type of device used). Alongside (or in addition to) them, there may exist (and thus be

used) "other tracking tools," which can be classified as "active" (having almost the same characteristics as cookies) and "passive" (e.g., fingerprinting).

2.2. Beyond the described intrinsic characteristics, cookies (and other tracking tools) can exhibit different features in terms of time (and can therefore be considered "session"² or "permanent"³ based on their duration), from a subjective perspective (depending on whether the publisher acts independently or on behalf of a "third party"), and finally (but especially), based on the processing purpose pursued, allowing them to be categorized into two different (macro) categories:

¹ See Recital no. 30 of the GDPR ("Natural persons can be associated with online identifiers produced by devices, applications, tools, and protocols, such as IP addresses, or with temporary markers (cookies) or with other identifiers, such as radio frequency identification tags. These identifiers can leave traces that, in particular, when combined with unique identifiers and other information received from servers, can be used to create profiles of natural persons and identify them"), and Article 122, paragraphs 1) and 2) of the Privacy Code ("1. The storage of information in the terminal equipment of a subscriber or user or access to information already stored is permitted only on condition that the subscriber or user has given his consent after being informed in a simplified manner. This shall not prevent any technical storage or access for the sole purpose of carrying out the transmission of a communication over an electronic communications network, or as strictly necessary in order for the provider of an information society service explicitly requested by the subscriber or user to provide the service. For the purpose of determining the simplified methods referred to in the first paragraph, the Garante shall also take account of the proposals made by the associations most representative at national level of consumers and the economic categories involved, with a view to ensuring the use of methods that ensure the subscriber's or user's effective awareness. 2. For the purposes of the expression of the consent referred to in paragraph 1, specific configurations of computer programs or devices that are easy and clear to use for the subscriber or user may be used..."); see also page 15 of Decision no. 231 of 10.6.2021 signed by the Italian Data Protection Authority (Garante Privacy): "...there is still no universally accepted system for the semantic encoding of cookies and other tracking tools that objectively distinguishes, for example, technical ones from analytics or profiling ones, unless based on the indications provided by the data controller in the privacy policy [...] it is hoped that a general coding system will be developed quickly."

² Cookies designed to collect and store data while a user accesses a website and disappear once the user has closed the browsing session.

³ Cookies capable of lasting for a predetermined period of time (e.g., minutes, months, years).

- "Technical," used solely for "the transmission of a communication over an electronic communications network, or as strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide the service" (Article 122, paragraph 1) of the Privacy Code. In this regard, the Italian Data Protection Authority (Garante Privacy) has highlighted, in Decision no. 231 of 10.6.2021 (in line with the previous decision in 2014), that "cookie analytics"⁴ can indeed fall within the scope of "technical" cookies (or other tracking tools) (and thus can be used without prior consent from the data subject) under certain conditions aimed at preventing the direct identification of the data subject (single out)⁵ through their use.

- "Profiling" / "marketing" cookies (so-called non-technical cookies), used to attribute specific actions or recurring behavioral patterns in the use of offered features (patterns) to identifiable or identifiable individuals, with the purpose of grouping different profiles into homogeneous clusters of varying sizes. This allows the Data Controller to, among other things, customize the service provision beyond what is strictly necessary for service delivery and send targeted advertising messages (i.e., in line with the preferences expressed by the user during online browsing).

3 - Cookies Installed on the Website.

3.1. - Within the Website, the following types of cookies have been installed (or can be installed, subject to obtaining specific consent from the user):

Name	Type	Function/Data collected	First/third party	Duration
_GA_GA259KXK5BEH	Analytics	Records a unique ID used to generate statistical data on how the visitor uses the site	First party	4/2024 4/2024
_GID	Analytics	Records a unique ID used to generate data	First party	4/2022

⁴ Analytical cookies are typically used to assess the effectiveness of an information society service provided by a publisher, for website design, or to help measure its traffic (i.e., the number of visitors, potentially segmented by geographic area and connection time).

⁵ See Decision no. 231 of 10.6.2021 signed by the Italian Data Protection Authority (Garante Privacy), pages 13/14: "The structure of analytical cookies must then allow them to be attributable not only to one but to multiple devices, creating reasonable uncertainty about the digital identity of the recipient. Usually, this effect is achieved by masking certain portions of the IP address within the cookie. Considering the representation of IPv4 (32-bit) addresses, which are commonly represented and used as a sequence of four decimal numbers ranging from 0 to 255 separated by periods, one measure that can be implemented to benefit from the exemption is the masking of at least the fourth component of the address, an option that introduces uncertainty in attributing the cookie to a specific data subject equal to 1/256 (about 0.4%). Similar procedures should be adopted for IPv6 (128-bit) addresses, which have a different structure and a much larger address space (being composed of binary numbers represented with 128 bits). The Garante also emphasizes the need for the use of analytical cookies to be limited solely to the production of aggregated statistics and that they be used in relation to a single website or a single mobile application, so as not to allow tracking of the browsing of individuals using different applications or visiting different websites. It is understood, therefore, that third parties providing web measurement services to the publisher should not combine the minimized data with other processing (such as customer files or visit statistics to other websites, for example), nor transmit them to further third parties, as this would unacceptably increase the risk of user identification, except in cases where the production of statistics performed by them with minimized data concerns multiple domains, websites, or apps attributable to the same publisher or business group. However, it is possible to consider it lawful, even without the adoption of the prescribed minimization measures, to use statistical analysis related to multiple domains, websites, or apps attributable to the same data controller, provided that the data controller independently carries out the statistical processing, without these analyses actually becoming an activity that, exceeding the boundaries of mere statistical counting, assumes the characteristics of processing aimed at making commercial decisions."

		statistics on how the visitor uses the site.		
_GAT_UA-225094070-1	Technical	Used to limit the rate of requests.	First party	4/2022
_FBP	Marketing	Used by Facebook to deliver a variety of advertising products, such as real-time bidding from third party advertisers.	Third party	7/2022
_SSID	Technical	Used to prevent fraud and abuse.	Third party (google)	4/2024
_GCL_AU	Analytical	Used by Google AdSense to understand user interactions with the site and advertising	First party	7/2022
FR	Marketing/Targeting	Used to provide ad serving or retargeting.	Third party (facebook)	7/2022
SECURE-3PSIDCC _SECURE-3PSID _SECURE-1PSID _SECURE-3PAPISID _SECURE-1PAPISID	Technical	Cookie necessary to use the options and the services of the website.	Third party (google)	4/2023 3/2024 3/2024 3/2024 3/2024
HSID	Technical	Used to avoid abuse.	Third party (gogle)	3/2024
SID SIDCC SAPISID APISID NID 1P_JAR	Analytical	Memorizes the user's preferences and information each time he visits web pages containing Google services.	Third party (google)	3/2024 4/2024 3/2024 4/2024 10/22 9/2022
COOKIECONSENT	Technical	Stores the user's consent status	First party	4/2023
IDE	Analytical/Marketing	Used by Google DoubleClick to record and produce reports on the user's actions on the site after viewing or clicking one of the advertiser's advertisements in order to measure the effectiveness of an advertisement and present targeted advertising to the user.	Third party (doubleclick)	4/2023
TR	Marketing	Used by Facebook to provide a variety of advertising products such as real-time bidding from third-party advertisers.	Third party (facebook)	Session

4 - Browser Settings.

4.1. - T1 highlights the user's ability to delete and disable the operation of the cookies described in the previous Article 3 at any time using the appropriate setting functions within the used browser. In this regard, T1 adds that if the user decides to disable the technical cookies mentioned in Article 2.2, point i), the quality and speed of the services and features offered and made available on the Site may deteriorate.

Information on how to manage cookies with some of the most common browsers can be found by visiting the following web pages:

<https://support.google.com/chrome/answer/95647?hl=it>

<https://support.mozilla.org/it/kb/Gestione%20dei%20cookie?redirectlocale=enUS&redirectslug=Cookies>

<https://support.microsoft.com/it-it/help/17442>

<https://support.microsoft.com/it-it/help/4468242/microsoft-edge-browsing-data-andprivacy-microsoft-privacy>

<https://support.apple.com/it-it/guide/safari/sfri11471/mac>

<https://support.apple.com/it-it/HT201265>

<https://help.opera.com/en/latest/security-and-privacy/#clearBrowsingData>

5 - Data Subject Rights.

5.1. - Concerning the user's personal data, T1 informs that the data subject, as defined in Article 4 no. 1) of the GDPR, has the right to exercise the following rights, subject to any limitations provided for in Articles 2 undecies and 2 duodecies of the Privacy Code: right of access under Article 15 of the GDPR: the right to obtain confirmation as to whether or not personal data concerning the data subject is being processed, as well as the information outlined in Article 15 of the GDPR (e.g., purposes of processing, retention period); right to rectification under Article 16 of the GDPR: the right to correct, update, or supplement personal data; right to erasure under Article 17 of the GDPR: the right to obtain the erasure, destruction, or anonymization of personal data, subject to the conditions listed in the same article; right to restriction of processing under Article 18 of the GDPR: a right with a predominantly precautionary character, aimed at obtaining the limitation of processing in cases provided for in Article 18 itself; right to data portability under Article 20 of the GDPR: the right to receive personal data provided to T1 in a structured,

commonly used, and machine-readable format (and, where requested, to transmit them directly to another data controller), subject to the specific conditions set out in the same article (e.g., legal basis of consent and/or performance of a contract; personal data provided by the data subject); right to object under Article 21 of the GDPR: the right to permanently cease a specific processing of personal data; right to lodge a complaint with the Supervisory Authority (i.e., the Italian Data Protection Authority) under Article 77 of the GDPR: the right to file a complaint if it is believed that the processing under scrutiny violates national and EU regulations on personal data protection.

5.2. - In addition to the rights described in the preceding Article 5.1, T1 specifies that, in relation to the data subject's personal data, there exists, where possible and appropriate, the option to exercise, on the one hand, the (sub) right provided for in Article 19 of the GDPR ("The data controller shall communicate any rectifications or erasures or restrictions of processing carried out in accordance with Articles 16, 17(1), and 18 to each recipient to whom the personal data have been disclosed unless this proves impossible or involves disproportionate effort. The data controller shall inform the data subject about those recipients if the data subject requests it"), which is considered connected and related to the exercise of one or more rights regulated in Articles 16, 17, and 18 of the GDPR. On the other hand, T1 specifies that, in relation to the data subject's personal data, there exists, where possible and appropriate, the option to exercise the right provided for in Article 22(1) of the GDPR ("The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her"), subject to the exceptions provided for in the subsequent paragraph 2).

5.3. - In compliance with Article 12(1) of the GDPR, T1 undertakes to provide the user with communications as stipulated in Articles 15 to 22 and 34 of the GDPR in a concise, transparent, intelligible, easily accessible, and plain language: such information will be provided in writing or by other electronic means or, upon request of the user, orally, provided that the user's identity is proven through other means.

5.4. - In compliance with Article 12(3) of the GDPR, T1 informs that it commits to providing the user with information about the action taken in response to a request under Articles 15 to 22 of the GDPR without undue delay and, in any

case, no later than one month from the receipt of the request itself; this period may be extended by an additional two months if necessary, taking into account the complexity and number of requests (in such a case, the Data Controller undertakes to inform the user of such an extension and the reasons for the delay within one month from the receipt of the request).

5.5. - The user can exercise the above-described rights (excluding the right under Article 77 of the GDPR) at any time by using the contact details provided in Article 6.

6 - Contact Information.

6.1. - T1 can be contacted at the following address:
terminalonepec@legalmail.it

7 - Social Plug-ins.

7.1. - In compliance with EDPB Guidelines No. 7/2020, T1 also specifies that it qualifies as a co-Controller of the processing under Articles 4 no. 7) and 26 of the GDPR with certain social media providers (e.g., LinkedIn, Facebook), due to the installation of their respective social plug-ins within the Site, which are easily visible and accessible on the Site.

Reggio Emilia (RE), April 8, 2022 (date of last update)

TERMINAL ONE S.p.A.

(on behalf of its pro tempore legal representative)