

## Cookie Policy — Information

This information, in accordance with Article 13 of Regulation (EU) of the European Parliament and of the Council, is in compliance with the provisions of Legislative Decree 196/2003 and s.m.i. of the Italian Republic, the provision of the Data Protection Authority for the protection of personal data no. 229 of May 8, 2014 and the Directive 2002/58/EC of the European Parliament and of the Council.

### What are Cookies?

Cookies are data created by a server and stored in text files on your computer's hard disk and allow the operation of this website, the use of a specific function explicitly requested by the user, or improve the functioning of this site, such as cookies that make browsing faster or show the most interesting content for the user based on previous choices. Cookies can be permanent (so-called persistent cookies), but they can also have a limited duration (so-called session cookies). This site uses both persistent and session cookies. Session ones are not permanently stored on your computer and disappear when the browser is closed. Persistent ones are used to customize the navigation according to the tool used by the user (computer, tablet, smartphone) as well as third party cookies that are used to analyze the website logins (eg Google Analytics) and to allow users to share the contents of the site through social networks (FB) or email. These cookies are stored permanently on your computer and have a variable duration.

### Types of Cookies

The Italian legislation (Article 122 of Legislative Decree 196/03 "Code on the protection of personal data" briefly referred to as the "Code") introduced in our system the Community Directive 2009/136 /EC which requires the website operators that use cookies or other monitoring technologies to inform the user about the types of cookies used by the site.

The Provision of the Authority for the protection of personal data No 229 of May 8 2014, published on the G.U. No 126 of June 3 2014, classified cookies in two macro-categories: "technical" cookies and "profiling" cookies. *Technical Cookies*, normally installed by the website owner or manager, are intended to "transmit a communication over an electronic communications network, or when strictly necessary for the provider of an information society service, as explicitly requested by the subscriber or user" (see Privacy Code article 122, paragraph 1). The prior consent of the users is not required for the installation of the Technical Cookies. Technical cookies are further divided into:

*Navigation or session cookies*, which guarantee the normal navigation and use of the website, allowing, for example, to make a purchase or authenticate to access to restricted areas. These cookies are not stored permanently on the device used by the user and are automatically deactivated when the browser is closed. Their use is linked to the transmission of identification data necessary to allow a safe and efficient browsing. Session cookies in no way allow the acquisition of personal identification data.

*Analytics cookies*, used to collect information on the use of the site, in anonymous form and to obtain both a statistical analysis of the pages viewed and the behaviors kept by users. This anonymous analysis provides information and suggestions to improve the quality of the site and to make the most popular and interesting contents easily accessible to users. Analytics cookies can be sent both from the site and from third party domains and they in no way allow the acquisition of personal identification data. Analytics cookies, when installed by third parties (e.g. Google analytics) and even if they collect data anonymously, shall be treated as profiling cookies, as indicated by the Guarantor for the protection of personal data.

*Functionality cookies*: treated as technical cookies when used directly by the site manager to collect aggregate data on the number of users and how they visit the site. These cookies allow the user to browse according to a set of selected criteria (for example, the language) in order to improve the service provided.

*Profiling Cookies* are intended to create user profiles and are used to transmit advertising messages in line with the preferences shown by the user while browsing the net. These cookies are particularly invasive in the private sphere of the user, for this reason the European and Italian legislation requires the user must be adequately informed about the use of the same, being able to express his consent. The art. 122 of the Privacy Code refers to them, stating that "the storage of information in the terminal equipment of a contractor or a user or access to information already stored is permitted provided that the contractor or user has expressed his consent after being informed in the simplified ways pursuant to Privacy Code, Article 13, paragraph 3" (Article 122, paragraph 1 of the Code).

In the same legislation, the Guarantor has also classified cookies according to the subject who acts as the data controller of personal data collected by the cookie, distinguishing between "first party" and "third party" cookies. First party cookies

These cookies are managed by the site owner. For these cookies, the obligation of disclosure rests with the owner of the site. The latter also has the obligation to indicate the methods for the possible blocking of the cookie. Third party cookies

These cookies are managed by a third party, different by the site owner. For these cookies, the mandatory disclosure and the obligation to indicate the methods for the possible blocking of the cookie rests with the third party, while the owner of the site is obliged to insert a link to the third party's website, when available, on the site. In both types of cookies (first party or third party) user's consent, necessary if the cookie is a profiling one, occurs through a special banner on the home page of the site.

Types of Cookies used on our website

[www.promovenorthamerica.com](http://www.promovenorthamerica.com) website uses technical cookies, which can be used without requesting the consent of the data subject, since they are strictly necessary for the provision of the service. Furthermore, third party profiling cookies can be used, the use of which is subject to the direct consent of these third parties by accessing the data-protection information on the use of cookies. The profiling cookies can be used by the data controller or by the owner of the cookie itself to store the choices made by the data subject, to provide customized or optimized functions or to store his or her habits and preferences shown while browsing. For example, profiling cookies can be used to offer online services to the data subjects, to send them advertisements that take into account their interests or to prevent them from being offered services that they have refused in the past.

The next section of this Cookie Policy is detailed in all the cookies used by this website.

The first group lists the so-called technical cookies whose use does not require the user's consent.

The second group lists the profiling cookies.

For both groups, the following information is shown for each type of cookie:

- cookie name
- function performed by the cookie
- indication if the cookie is first party or third party
- if it is a third-party cookie, indication of the link through which it is possible to reach the third party' site where the information of the third party regarding the processing of personal data collected through the cookie is reported and the methods for the cookie blocking
- cookie expiration

[www.promovenorthamerica.com](http://www.promovenorthamerica.com) website uses the following cookies:

Cookie Name	Purpose	Duration	Cookie Type
<b>XSRF-TOKEN</b>	Used for security reasons	Session	Essential
<b>hs</b>	Used for security reasons	Session	Essential
<b>svSession</b>	Used in connection with user login	Session	Essential
<b>SSR-caching</b>	Used to indicate the system from which the site was rendered	1 minute	Essential
<b>_wixCIDX</b>	Used for system monitoring/debugging	3 months	Essential
<b>_wix_browser_sess</b>	Used for system monitoring/debugging	session	Essential
<b>consent-policy</b>	Used for cookie banner parameters	12 months	Essential
<b>smSession</b>	Used to identify logged in site members	Session	Essential
<b>TS*</b>	Used for security and anti-fraud reasons	Session	Essential
<b>bSession</b>	Used for system effectiveness measurement	30 minutes	Essential
<b>fedops.logger.sessionId</b>	Used for stability/effectiveness measurement	12 months	Essential
<b>wixLanguage</b>	Used on multilingual websites to save user language preference	12 months	Functional

No exchange cookies with external sites or external data providers is provided.

The authorization to collect and store data using cookies can be revoked at any time: the data subject can disable the use of cookies through the specific setting options of the different browsers.

Microsoft Explorer:

<https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>

• Google Chrome:

<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=it>

Mozilla Firefox:

<https://support.mozilla.org/it/kb/Bloccare%20i%20cookie>

• Apple Safari:

<https://support.apple.com/kb/ph21411?locale=it> IT

### **Google Analytics Cookies**

Our site uses Google Analytics by Google, Inc., a service that offers measurement statistics and analysis of site performance, through the use of cookies. To consult the privacy information of Google Analytics' service, please visit <http://www.google.com/intl/en/analytics/privacyoverview.html>. For Google's privacy policy, we wish to point out the following website address <http://www.google.com/intl/it/privacy/privacy-policy.html>.

### **Google AdWords & Google Remarketing Cookies**

The website could use Google AdWords program and Google Remarketing technology. Both are managed by Google Inc. AdWords conversion tracking feature also uses cookies. In order to help us in monitoring activities, a cookie is added to a user's computer when the user clicks on an ad. This cookie lasts 30 days and it does not collect or monitor information that can personally identify a user. Users can disable Google conversion tracking cookies in their browser settings. In some cases, cookies can cause problems in gaining access or browsing your AdWords account. When this occurs, the best way to solve the problem is to clear the cache and delete saved cookies for your browser.

Finally, the user can disable Google Analytics cookies by downloading a specific browser plug-in available at the following URL <https://tools.google.com/dlpage/gaoptout>.

### **Facebook Cookies**

The site may use Facebook Inc. cookies to monitor the progress of Facebook Ads campaigns and any remarketing actions. Click here for more information about the use of cookies by Facebook: <https://www.facebook.com/help/cookies/>.

Users can object to the registration of persistent cookies on their hard disk by configuring the navigation browser to disable cookies. Find out how to disable cookies in the main browsers: Chrome, Firefox, Internet Explorer, Safari, Opera. However, after this operation, some functions of the web pages may not be performed correctly.

### **WHAT IS THE PURPOSE OF DATA PROCESSING?**

The data collected by the Data Controller are used to:

- count the number of site visitors;
- check if you have browsed through e-mail or through a link;
- verifying how successful a specific advertising campaign has been;
- establish particular levels of interest for specific sections or aspects of the site or for certain products and services available on this site;
- understand how popular a product or service is and the level of variation in the interest between specific products and the owner's services;

improve the use of the site and record statistics on its use, as well as profile the data subjects; register and census the data subject on the [www.promovenorthamerica.com](http://www.promovenorthamerica.com) website.

- send commercial communications regarding the activity and the services offered by the company.

The data may also be processed through automated decision-making processes, such as profiling, in order to improve browsing and the offer to the final customer.

### **COOKIE POLICY UPDATE**

This Cookie Policy has been updated on 11/10/2018 Any updates will always be published on this page.

For more information on privacy click here.