

COOKIES POLICY

CLEVERTECH S.p.A., (tax ID and VAT no.: 01307860351) (hereinafter, “CLEVERTECH”), represented by its pro tempore legal representative, with registered office in Cadelbosco Sopra (RE), via Giacomo Brodolini 18/A, in its capacity as Data Controller pursuant to Articles 4(7) and 24 of EU Regulation 2016/679 (GDPR), describes below the cookie policy referring to the website www.cleverttech-group.com (“Website”).

1. Preliminary considerations.

1.1. First and foremost it is necessary to specify that the reference legal framework currently consists of the following first and second level regulatory provisions: i) Directive no. 2002/58/EC as amended, most recently, by Directive no. 2009/136/EC (“E-Privacy Directive”) and later incorporated within the national legal system by Article 122 of the amended Italian Legislative Decree no. 196/2003 (Privacy Code); ii) EU Regulation no. 2016/679 (GDPR), with a particular focus on the notion of “consent” pursuant to Articles 4(11) and 7 of Recital no. 32) of the same GDPR, as most recently interpreted by EDPB Guidelines no. 5/2020; iii) Measure no. 229 of 8.5.2014 of the Italian Data Protection Authority; iv) Recommendation no. 2/2001 of the Article 29 WP (now the EDPB); v) Opinion no. 4/2012 of the Article 29 WP.

2. Cookies: definitions and characteristics.

2.1. In general, cookies are small strings of text that the website visited by the user (internet publisher or “first-party” website) or a different website or web server (“third-party”) visited by the user position and archive (directly, in the case of the publisher; indirectly, in the case of “third-party” websites) in a terminal device¹ available to the user²; they are comparable to certain similar technologies such as, for example, web beacons and all those forms of local storage introduced with HTML5.

Cookies may be separated into the following types based on the purpose pursued with their installation:

- ◆ **Technical cookies:** these are those cookies that are indispensable for the proper transmission and functioning of a website, including those services (and the relative functions) requested by the user (e.g., session identification; completion of a registration; enabling and/or sharing of content); this also includes the (micro) category of preference (or personalisation) cookies, which save a series of information in order to thus enable the user to access the service in a condition different from that of any other party (e.g., saving of a shopping cart, the language selected);
- ◆ **Analytical (or measurement) cookies:** these are those cookies used to collect and analyse traffic and the use of a website in anonymous and aggregate form; even without identifying a user, these cookies make it possible, for example, to identify if the same user connects again later on, monitor the system and, therefore, improve its performance and usability;
- ◆ **Profiling (or behavioural advertising) cookies:** these are those cookies that make it possible to save information on user behaviour by observing (including on an ongoing basis) the user’s browsing habits, in order to develop a specific profile and, as a result, display and show to the user one or more personalised advertising messages.

Also with regard to their objective characteristics, it is also appropriate to observe that cookies can be separated into the following two macro categories, based on the temporal duration of activation:

- ◆ **Session cookies:** these are designed to collect and save data while a user accesses a website, and disappear once the user has closed the relative browsing session;
- ◆ **Persistent cookies:** these are those which last for a pre-established period of time, which may range from a few minutes up to a few years.

Lastly, from the subjective perspective, cookies may be broken down into the following two macro categories:

- ◆ **First-party cookies:** these are those cookies set by a Data Controller (or its Data Processor) which manages the website visited by the user;
- ◆ **Third-party cookies:** these are those cookies set by a Data Controller other than the one that manages the website visited by the user (as defined by the current URL displayed in the browser’s address bar).

3. Cookies installed on the Website.

3.1. The following categories of cookies are installed on the Website:

a) Technical cookies:

| Name | Provider | Purpose | Expiration Type |
|------|----------|---------|-----------------|
|------|----------|---------|-----------------|

¹ These terminals refer, for example, to personal computers, tablets, smartphones and any other device capable of saving personal or non-personal information.

² Also see Recital no. 30 GDPR: “Natural persons may be associated with online identifiers provided by their devices, applications, tools and protocols, such as internet protocol addresses, cookie identifiers or other identifiers such as radio frequency identification tags. This may leave traces which, in particular when combined with unique identifiers and other information received by the servers, may be used to create profiles of the natural persons and identify them.”

| Name | Provider | Purpose | Expiration | Type |
|--------------------|---------------------------|--|------------|------|
| CookieConsent [x2] | Cookiebot | Saves the user's cookie consent status for the current domain | 1 year | HTTP |
| PHPSESSID | www.cleverttech-group.com | Saves the user's statuses on the different pages of the website. | Session | HTTP |

b) Technical personalisation cookies:

| Name | Provider | Purpose | Expiration | Type |
|----------------------------|---------------------------|---|------------|------|
| CookieConsentBulkSetting-# | Cookiebot | Allows for the authorisation of the cookie across multiple websites | Persistent | HTML |
| lang [x2] | LinkedIn | Remembers the linguistic version of a website selected by the user | Session | HTTP |

c) Analytical cookies:

| Name | Provider | Purpose | Expiration | Type |
|----------------|------------------------------------|--|-------------|------|
| _ga | Google Tag Manager | Registers a unique ID used to generate statistical data on how the visitor uses the website. | 2 years | HTTP |
| _gat | Google Tag Manager | Used by Google Analytics to limit the frequency of requests | 1 day | HTTP |
| _gid | Google Tag Manager | Registers a unique ID used to generate statistical data on how the visitor uses the website. | 1 day | HTTP |
| #-post-views_# | www.cleverttech-group.com | Pending | 354974 days | HTTP |

d) Marketing/profiling cookies:

| Name | Provider | Purpose | Expiration | Type |
|-----------------------------|-------------------------|--|------------|------|
| IDE | Google | Used by Google DoubleClick to register and generate reporting on the user's actions on the website after having viewed or clicked on one of the advertiser's advertisements in order to measure the effectiveness of an ad and present ads targeted to the user. | 1 year | HTTP |
| test_cookie | Google | Used to check whether the user's browser supports the cookies. | 1 day | HTTP |
| VISITOR_INFO1_LIVE | YouTube | Attempts to estimate the speed of the user's connection on pages with integrated YouTube videos. | 179 days | HTTP |
| YSC | YouTube | Registers a unique ID for statistics linked to which YouTube videos have been viewed by the user. | Session | HTTP |
| yt.innertube::nextId | YouTube | Registers a unique ID for statistics linked to which YouTube videos have been viewed by the user. | Persistent | HTML |
| yt.innertube::requests | YouTube | Registers a unique ID for statistics linked to which YouTube videos have been viewed by the user. | Persistent | HTML |
| yt-remote-cast-installed | YouTube | Saves the user's video player preferences by using the incorporated YouTube video | Session | HTML |
| yt-remote-connected-devices | YouTube | Saves the user's video player preferences by using the incorporated YouTube video | Persistent | HTML |
| yt-remote-device-id | YouTube | Saves the user's video player preferences by using the incorporated YouTube video | Persistent | HTML |
| yt-remote-fast-check-period | YouTube | Saves the user's video player preferences by using the incorporated YouTube video | Session | HTML |
| yt-remote-session-app | YouTube | Saves the user's video player preferences by using the incorporated YouTube video | Session | HTML |
| yt-remote-session-name | YouTube | Saves the user's video player preferences by using the incorporated YouTube video | Session | HTML |

| Name | Provider | Purpose | Expiration | Type |
|------------------|--------------------------|---|------------|-------|
| bcookie | LinkedIn | Used by the LinkedIn social network service to track the use of integrated services. | 2 years | HTTP |
| bscookie | LinkedIn | Used by the LinkedIn social network service to track the use of integrated services. | 2 years | HTTP |
| lidc | LinkedIn | Used by the LinkedIn social network service to track the use of integrated services. | 1 day | HTTP |
| UserMatchHistory | LinkedIn | Used to track visitors on multiple websites, in order to present pertinent ads based on visitor preferences. | 29 days | HTTP |
| ads/ga-audiences | Google | Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites. | Session | Pixel |

e) Unclassified cookies are cookies that are in the classification phase, along with providers of individual cookies.

| Name | Provider | Purpose | Expiration | Type |
|----------------------|--------------------------|---------|------------|------|
| AnalyticsSyncHistory | LinkedIn | Pending | 29 days | HTTP |

4. Responsibility for the activities of third-party cookies.

4.1. In this regard, reference is made to the text of the above-mentioned Measure no. 229 of 8.5.2014: "There are multiple reasons why it is not possible to require the publisher to provide the disclosure and obtain consent for the installation of cookies within its website for those installed by "third parties" as well. In the first place, the publisher should always have the tools and economic/legal capacity to take responsibility for the obligations of third parties and should therefore also be able to check from time to time the correspondence between what has been stated by third parties and the purposes that they are actually pursuing with the use of cookies. This is made rather difficult by the fact that the publisher often is not directly aware of all third parties that install cookies through its website and, therefore, it also does not know the logic underlying the relative processing. Furthermore, not infrequently, there are parties between the publisher and third parties acting as concessionaires, which indeed makes it very complex for the publisher to check the activities of all parties involved. Third-party cookies could also be modified over time by the third-party providers and it would not be feasible to expect the publishers to keep track of these subsequent modifications as well".

5. Browser settings.

5.1. Please note that users are able to delete and block the operations of cookies at any time by using the dedicated setting functions present in their browsers: in this regard, it is however necessary to add that if they decide to deactivate technical cookies, the quality and speed of the services and functions offered and made available on the Website could deteriorate.

6. Rights of the data subject.

6.1. In relation to your personal data, the Data Controller informs you that, in compliance with Guidelines no. 260/2018 of the Article 29 WP, you are entitled to exercise the following rights, possibly subject to the limitations set forth in Articles 2 undecies and 2 duodecies of the Privacy Code: right of access pursuant to Article 15 GDPR: right to obtain confirmation concerning whether processing of personal data regarding the relative data subject is under way, as well as the information pursuant to Article 15 GDPR (e.g., purpose of processing, retention period); right to rectification pursuant to Article 16 GDPR: right to correct, update or add to personal data; right to erasure pursuant to Article 17 GDPR: right to have the personal data deleted or destroyed or anonymised, when however the requirements listed in the same article are met; right to restriction of processing pursuant to Article 18 GDPR: right with a predominantly protective purpose, intended to restrict processing when the conditions governed by the same Article 18 are met; right to data portability pursuant to Article 20 GDPR: right to obtain the personal data provided to the Data Controller in a structured, commonly used and machine readable format (and, when requested, to transmit them directly to another Data Controller), when the specific conditions laid out in the same article are met (e.g., legal basis of consent and/or execution of a contract; personal data provided by the data subject); right to object pursuant to Article 21 GDPR: right to have specific personal data processing terminated on a permanent basis; right to lodge a complaint with the supervisory authority (i.e., the Italian Data Protection Authority) pursuant to Article 77 GDPR: right to lodge a complaint when it is deemed that the processing subject to analysis violates national and EU regulations on personal data protection.

6.2. In compliance with Article 12(1) GDPR, the Data Controller will provide you with the communications pursuant to Articles 15 to 22 and 34 GDPR in a concise, transparent, intelligible and easily accessible form in simple and clear language; such information will be provided in writing or by other means, possibly electronic, or, at the request of the data subject, verbally, provided that the identity of the data subject can be proven by other means.

6.3. In compliance with Article 12(3) GDPR, the Data Controller informs you that it will provide you with the information relating to the action taken with regard to a request pursuant to Articles 15 to 22 GDPR without unjustified delay and, in any event, at the latest within one month of receipt of the request; that period may be extended by 2 months, if necessary, taking into account the

complexity and number of the requests (in this case, the joint Data Controllers undertake to inform the data subject of such extension and the reasons for the delay, within one month of receipt of the request).

6.4. You may at any time exercise the above rights (apart from the right pursuant to Article 77 GDPR) by using the contact details provided in Article 7.

7. Contact details.

7.1. The Data Controller may be contacted at the following address: info@cleverttech-group.com

Cadelbosco Sopra, dated 4.3.2021 (date of most recent update).

CLEVERTECH S.p.A.

(represented by its pro tempore legal representative)

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