# **COOKIES POLICY**

#### 1. NORMATIVE SOURCES

**Privacy Guarantor** 

Identification of the simplified procedures for the information and the acquisition of consent for the use of cookies - 8 May 2014

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Register of measures n. 229 of 8 May 2014

Pursuant to the aforementioned legislation, in the name and on behalf of the website www.etabetaformazione.it (also referred to as "our site" and/or "our website") we provide the following information.

#### 2. WHAT ARE COOKIES

Cookies are small text strings that the sites visited by the user send to his terminal (usually to the browser), where they are stored before being re-transmitted to the same sites at the next visit of the same user. During navigation on a site, the user can also receive cookies on their terminal that are sent from different websites or web servers (so-called "third parties"), on which some elements may exist (such as, for example, images, maps, sounds, specific links to pages of other domains) on the site that the same is visiting.

Cookies, usually present in users' browsers in very large numbers and sometimes even with long temporal persistence, are used for different purposes: execution of computer authentication, monitoring of sessions, storage of information on specific configurations concerning users accessing the server, etc.

In order to arrive at a correct regulation of such devices, it is necessary to distinguish them since there are no technical characteristics that differentiate them from one another precisely on the basis of the aims pursued by those who use them.

In this regard, and for the purposes of this provision, two macro-categories are therefore identified: "technical" cookies and "profiling" cookies.

### a. Technical cookies.

Technical cookies are those used for the sole purpose of "transmitting a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide this service "(see Article 122, paragraph 1, of the Code).

They are not used for other purposes and are normally installed directly by the owner or operator of the website. They can be 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 restricted areas); analytics cookies, similar to technical cookies when used directly by the site operator to collect information, in aggregate form, on the number of users and how they visit the site; Functional cookies, which allow the user to navigate according to a series of selected criteria (for example, the language, the products selected for purchase) in order to improve the service provided. For the installation of these cookies the prior consent of users is not required, while the obligation to provide information pursuant to art. 13 of the Code, that the site manager, if he uses only such devices, will be able to provide in the manner he deems most suitable.

In many cases, the sites use, for mere statistical purposes, analytical cookies created and made available by third parties. In these cases, it is believed that the aforementioned sites are not subject to the obligations and obligations required by law (notification to the Guarantor in particular) if appropriate tools are adopted to reduce the identifying power of the analytical cookies they use (for example, by masking significant portions of the IP address).

### b. Profiling cookies.

Profiling cookies are designed to create user profiles and are used in order to send advertising messages in line with the preferences expressed by the same in the context of surfing the net. Because of the particular

invasiveness that such devices can have in the private sphere of users, European and Italian legislation requires the user to be adequately informed about their use and express their valid consent.

The art. 122 of the Code whereby "the storage of information in the terminal device of a contractor or a user or access to information already filed is permitted only on condition that the contractor or the user has given his consent after being was informed with the simplified procedures referred to in Article 13, paragraph 3 "(Article 122, paragraph 1, of the Code).

In light of the above indicated on the basis of the subject in charge of which falls the management of cookies sent from a website are distinguished two types of cookies:

- "First Party" when they are directly managed by the owner and / or publisher of the website (ETA BETA) see paragraph 3.
- "Third party" when the cookies are managed by third parties to the website visited by the user see paragraph 5.

#### 3. TYPES OF COOKIES USED DIRECTLY BY OUR WEB SITE

This website uses only anonymous technical cookies, to optimize navigation based on user preferences (eg language, login, etc.). The information collected by these cookies are not used for commercial purposes and can not be disclosed to third parties. Therefore, the acquisition of the prior consent by the user is not envisaged. However, the user who also wants to refuse the use of technical cookies can disable them by inserting the appropriate configuration from the settings/options of their browser, as explained in the next paragraph 5. Disabling cookies, however, may involve:

- 1. Blocking the use of some parts of the site
- 2. A reduction in the level of functionality and assistance that the site can offer
- 3. The impossibility of remembering preferences.

Below is a description of the types of cookies sent from the ETA BETA website:

- Technical cookies, which are essential for the proper functioning of some sections of the site and are used to make it possible for users to navigate normally and to use the services available on the site, without which the latter could not work properly. Some of these cookies (defined as "persistent") remain in the user's navigation device for a prolonged and variable period of time depending on the case. Among the technical cookies for example those that allow you to store on the user's device the choice of the language or the links already visited, changing the relative color.
- Session cookies, which are sent on the user's device/browser to meet technical-functional requirements. These cookies are assigned to the user's device only for the duration of access to the site and are automatically deleted when the browser is closed.

# 4. TYPES OF COOKIES NOT USED DIRECTLY BY OUR WEB SITE

In order to make the user's browsing experience completely quiet and free of elements that can identify the user himself, making it potentially exposed to profiling activities resulting in targeted and non-targeted advertising, we have deliberately excluded from our website the sending profiling cookies.

#### 5. TYPES OF THIRD PARTY COOKIES USED IN OUR WEB SITE

The site can use links, buttons, images that can refer to external services or websites, which - if used (in the case of buttons, links and toolbars) or visited (in the case of sites) - may install third-party cookies part. These could be used for profiling activities. In this case, the user expressing his consent accepts the installation of third-party cookies, however - we repeat - will take place only when the user selects the link (or button or toolbar or link to the external site).

Below is a description of the types of third-party cookies accessible from the ETA BETA website:

• **Technical cookies,** which are essential for the proper functioning of some sections of the third-party site and are used to make it possible for users to navigate normally and to use the services available on the site, without which the latter could not work correctly. Some of these cookies (defined as "persistent") remain in the user's navigation device for a prolonged and variable period of time depending on the case. Among the technical cookies - for example - those that allow you to store on the user's device the choice of the language or the links already visited, changing the relative color.

- Session cookies, which are sent on the user's device / browser to meet technical-functional requirements. These cookies are assigned to the user's device only for the duration of access to the third-party site and are automatically deleted when the browser is closed.
- Analytical cookies, which are used for statistical information in order to improve the use of the site, in an absolutely anonymous form, on users' activity and on the use of the site by users: which: visited pages, time of permanence and geographic origin and used only for the purposes of site optimization and for information in aggregate form on the number of users and on how they visit the site. Such information does not provide in any way the identification of the user, nor the profiling and / or sending of targeted advertising.
- Profiling cookies, used to track user navigation on the web and create profiles on their tastes, habits, choices, etc. With these cookies, advertising messages can be transmitted to the user's terminal in line with the preferences already expressed by the same.

## Third-party cookies used by our site:

- **Google Maps cookie:** This service provided by Google allows the user to locate our position on a dynamic topographic map. The user's IP address is anonymized. The user can consult the extensive information on cookies at the site <a href="https://www.google.it/intl/it/policies/technologies/cookies/">https://www.google.it/intl/it/policies/technologies/cookies/</a>.
- Google ReCAPTCHA cookies: This service provided by Google allows when completing a form by the user to send a document (eg curriculum vitae) or to request a service (eg request for a quote) to understand if the person filling in the form is a human or a robot, in order to deny access to users with malicious intentions, to spam systems and bots that have the only interest of publishing false reviews or links to malicious sites. Our site uses the ReCAPTCHA only in the version visible to the user (ReCAPTCHA v2) who, in order to continue the action requested by the site, will simply have to put the check on a box that says "I am not a robot". In some cases Google may need to show him an additional test to validate him as a truly human user. The user can consult the extended information on site cookies at the following addresses:

https://www.google.com/intl/it/policies/privacy/

https://www.google.com/intl/it/policies/terms/

https://www.google.it/intl/it/policies/technologies/cookies/.

Social networks cookies: By selecting the buttons or links to the main social networks accessible
from our site (Facebook, LinkedIn, Twitter, Google+, etc.) it is possible that third-party profiling
cookies may be installed on the users' terminals. In this case, the user is invited to consult in advance
the relevant information on the categories of cookies used.

# 6. HOW TO DISABLE AND DELETE COOKIES

Most browsers (Edge, Firefox, etc.) are configured to accept cookies. However, all browsers allow you to control and disable cookies through browser settings. Disabling navigation cookies can cause the site to malfunction.

For information on how to manage and delete cookies, we propose below links to the instructions for the most common browsers:

- Edge
- Google Chrome
- Mozilla Firefox
- Safari
- Opera

We also provide a link to an external service, which allows cookies to be disabled / enabled for most external sites. This service, called "YourOnlineChoices", can be reached through the following link: http://www.youronlinechoices.com.

#### 7. REDIRECTION TO EXTERNAL WEBSITES OF THIRD PARTY

The third-party sites that can be accessed through this website (through text links or via buttons or images) are not covered by this statement. ETA BETA declines all responsibility for them and does not provide any

prior information. The categories of cookies used and the type of processing of personal data by third parties are regulated in accordance with the information provided by them.

#### 8. HOW WE ACQUIRE CONSENT TO RECEIVE COOKIES

In line with the provisions of current legislation, referred to in the first paragraph of the following document, called "Regulatory sources", consent to the receipt of cookies used by our website, is provided:

- By superimposing a banner containing a brief information. This requires an acceptance that can be
  expressed by the user either by clicking on the "Accept" button, or by continuing the browsing activity
  (by scrolling or browsing other pages and / or links). In any case, the user can always consult (even
  at a later time) this extended information by selecting the related link called [Info cookies] or
  [Cookies] reported in the footer of our website.
- Through this information.

### 9. LIABILITY LIMITATIONS

- For technical and/or functional reasons, the policy of managing cookies on our website may change
  over time. The user is therefore invited to periodically consult this information through the specific
  link implemented on our site to ascertain the correspondence between these changes and their
  preferences regarding privacy. ETA BETA declines all responsibility deriving from these variations.
- Since the installation of cookies operated by third parties through the services used within our website can not be technically controlled by the Owner, any specific reference to cookies installed by third parties is to be considered indicative. To obtain complete information, always consult the privacy policy of any third party services listed in this document.

#### 10. CONTACT DETAILS

Any communication, disclosure or complaint relating to the contents of this section regarding the policy of cookies will be sent in writing to the following addresses:

Email: direzione@etabetaformazione.it

Telefax: 098435697

Postal services: ETA BETA S.a.s., via Stanislao Giacomantonio n. 4/A, 87100 Cosenza.

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