**INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA OF USERS ONLINE - COOKIE POLICY PURSUANT TO REGULATION (EU) 2016/679 ("GDPR")**

**DATA CONTROLLER AND DATA PROTECTION OFFICER (DPO)**

The Data Controller is Indena S.p.A., having its registered office in Milan, Viale Ortles, n. 12, VAT Number 04411780150, e-mail privacy@idbholding.com (“Company” o “Data Controller”).

The Data Protection Officer can be reached at the e-mail address: [dpo@idbholding.com](mailto:dpo@idbholding.com)

**PERSONAL DATA PROCESSED**

Navigation data.

**WHAT ARE COOKIES**

Cookies are data created by a server that are stored in text files on your computer's hard disk or on any device you use to access the Internet (smartphone, tablet) and allow us to collect information about your navigation on the website.

Cookies can be permanently stored on your computer and have a variable duration (so-called persistent cookies), but they can also disappear when you close your browser or have a limited duration (so-called session cookies).

Cookies may be installed by the website you are visiting (so-called first-party cookies) or may be installed by other websites (so-called third-party cookies).

**HOW WE USE COOKIES**

1. **Technical Cookies**
2. session/navigation: The use of so-called session cookies (which are not permanently stored on the user's computer and disappear when the browser is closed) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary to enable the safe and efficient exploration of the site and its applications. The so-called session cookies used in the site avoid the use of other computer techniques potentially prejudicial to the confidentiality of user navigation and do not allow the acquisition of personal identification data of the user. They do not require your consent.
3. Persistent cookies: persistent cookies remain on your device even after you leave the website, until you delete them or until they expire. The site creates these cookies and stores them on your device so that they can be read when you visit the site again. This allows, for example, to find, even on subsequent visits to the site, the preferences set (e.g. wish list, shopping cart...). They do not require your consent.
4. **Cookie Analytics:** cookies installed to collect aggregate information of a mainly statistical nature (how long you stay on a web page, number of visitors to the site, etc.).
5. First party analytical cookies: similar to technical cookies as they are installed directly from the website you are visiting to improve their usability. They do not require your consent
6. Third-Party Analytical Cookies: Analytical cookies created and installed by third parties in order to analyze users' browsing in order to generate statistics on visits or to improve the offer of content, to show similar products and to place, if necessary, targeted advertising on web pages. The system used is Google Analytics, which is a web analysis service provided by Google LLC ("Google"). Google Analytics, like other systems, uses "cookies" to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the proper settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. Since the IP address is clear, the use of such cookies requires your consent. By clicking on the "Continue" button in the banner the user consents to the processing of data carried out by Google in the manner and for the purposes indicated above.
7. **Profiling Cookies:** cookies used to track the user's navigation on the web and create profiles based on his 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 user when browsing online.
8. First party profiling cookies: used and installed by Indena S.p.A. to collect information on the user's browsing habits with the aim of proposing advertising messages that are as relevant as possible to his interests. This means that they are also used to limit the number of times the user displays a specific advertisement: for Indena S.p.A. it means communicating more effectively, for the user it means receiving advertising that is less invasive and closer to their preferences. While browsing the Indena S.p.A. website, promotional cookies allow confirmation that the user is consulting advertising messages, showing him promotional content that may be of interest to him based on what he has previously visited. These cookies also allow, while the user browses other websites, to show content that he has recently consulted on the site [www.indena.com](http://www.indena.com) for promotional purposes. The site [www.indena.com](http://www.indena.com) uses promotional cookies exclusively in anonymous mode: the advertising is targeted but it is not identifiable who the user is. The promotional cookies used are permanent, although they remain in the user's device for a limited time. They require your consent.
9. Third party profiling cookies: used and installed by third parties to track the user's navigation on the web and create profiles on his tastes, habits, choices... These cookies are managed by third party companies such as [........]. On the site www.indena.com you can also find social buttons/widgets, i.e. those particular "buttons" representing social network icons (for example, Twitter). These "buttons" allow users who are browsing the website, to reach and interact with a "click" directly with social networks. Thanks to the click on Social buttons/widgets, the social network acquires the data related to the user's visit on the site www.indena.com and at the same time releases its own profiling cookies.

**COOKIE PREFERENCES MANAGEMENT**

Consent to the use of cookies is given by clicking on the "Continue" button present in the banner containing the short information notice, which appears when the user first accesses to the site.

**HOW TO CHANGE COOKIE SETTINGS**

Most Internet browsers are initially set to accept cookies automatically. This means that the user has the possibility, at any time, to set his browser to accept all cookies, only some of them, or to reject them all, disabling their use by the sites. In addition, the user can normally set his browser preferences so that he is notified whenever a cookie is stored on his computer. Finally, at the end of each browsing session, the user can delete the cookies collected from the hard disk of his device. If you wish to delete the cookies installed in the cookies folder of your browser, please note that each browser has different procedures for managing the settings.  
By selecting the links below the user can get specific instructions for some of the major browsers:  
Microsoft Edge: <https://support.microsoft.com/it-it/help/4027947/microsoft-edge-delete-cookies>

Google Chrome: <https://support.google.com/chrome/bin/answer.py?hl=en&answer=95647&p=cpn_cookies>  
Mozilla Firefox: <http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>  
Apple Safari: http://docs.info.apple.com/article.html?path=Safari/5.0/en/9277.html  
If you do not want to receive Google Analytics cookies, you can do so by logging on to the page: <https://tools.google.com/dlpage/gaoptout/>  
If you want to know more about cookies in general you can visit the page [http://www.allaboutcookies.org](http://www.allaboutcookies.org/)  
If the user wants to know more about online behavioral advertising and privacy, he can visit the page [http://www.youronlinechoices.com](http://www.youronlinechoices.com/)  
If you want to learn more about Google Analytics cookies you can visit <http://www.google.com/intl/it/analytics/privacyoverview.html>

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| --- | --- | --- | --- | --- | --- | --- |
| **Cookie** | **Name** | **Purpose** | **First / third party** | **Legal Basis** | **Duration** | **Further Information** |
| E.g.: Google Analytics | ……. | Analytical | Third party | Consent (if the IP is clear) | …… | E.g.: Google’s Privacy policy and the use of Google cookies are available at the following links: <https://www.google.com/intl/it/policies/privacy/>  <https://www.google.com/intl/it/policies/technologies/>  It is possible to download a Browser plug-in to permanently object to Google Analytics cookies at the following link:  <https://tools.google.com/dlpage/gaoptout?hl=it> |
| ……… | ……… | Social | Third party |  | ……… |  |
| ……… | ……… | ……… | ……… | ……… | ……… | ……… |

**MANDATORY DATA PROVISION**

The personal data processed through the installation of technical cookies and first party analytical cookies are necessary to ensure correct navigation within the website.

It is optional to give your consent to the installation of third party analytical cookies and profiling cookies. Your personal data will be processed by these cookies only with your express consent, as indicated above.

**DATA RECIPIENTS**

The data may be processed by external parties operating as independent data controllers such as, for example, supervisory and control authorities and bodies.

The data may also be processed, on behalf of the Company, by external subjects designated as data processors, to whom adequate operating instructions are given. These subjects are essentially included in the following categories:

* companies offering e-mail services;
* companies that offer services instrumental to the pursuit of the purposes indicated in this statement (IT suppliers, companies that deal with the management and maintenance of the site ...)

**PARTIES AUTHORISED TO PROCESS DATA**

Data may be processed by employees and/or collaborators of the Data Controller/Data Processor who have received adequate operating instructions and who have been expressly authorized to process it by the Data Controller/Data Processor.

**PERSONAL DATA TRANSFERS OUTSIDE THE EU**

The data collected using Google cookies may be transferred outside the European Union in accordance with Articles 45 and 46 of the GDPR.

**DATA SUBJECTS’ RIGHTS – COMPLAINT TO THE SUPERVISORY AUTHORITY**

By contacting, via e-mail at privacy@idbholding.com, data subjects can ask the data controller for access to the data concerning them, their cancellation, correction of inaccurate data, integration of incomplete data, limitation of processing in the cases provided for by art. 18 GDPR, as well as opposition to processing in the case of legitimate interest of the data controller.

Furthermore, if the processing is based on consent or contract and is carried out by automated means, the data subjects have the right to receive the data in a structured, commonly used and machine-readable format and, if technically feasible, to transmit them to another data controller without hindrance.

Data subjects have the right to withdraw the consent given at any time for marketing and/or profiling purposes, as well as to object to the processing of data for marketing purposes, including profiling related to direct marketing. The possibility for the data subject who prefers to be contacted for the above mentioned purpose exclusively through traditional methods, to express his opposition only to the receipt of communications through automated means, remains unchanged.

The data subjects have the right to lodge a complaint with the competent supervisory authority in the Member State where they habitually reside or work or in the State where the alleged infringement has occurred.