

# FULL COOKIE POLICY

## 1. Foreword

The website [www.leonardomedica.it](http://www.leonardomedica.it) uses cookies and similar technologies for various purposes, including improving the user experience of online applications. In particular, any purpose pursued by **Leonardo Medic srl** through the use of such tools will be defined in detail in this document, which is an integral part of the privacy policy.

In this regard, the company **Leonardo Medica S.r.l.**, as Data Controller, provides users of the website with detailed information on both the type of cookies (and similar technologies) and on how such cookies and navigation data are used and managed.

This information is provided pursuant to art. 13 of EU Regulation No. 2016/679 (hereinafter: the "Regulation") of the European Parliament and of the Council of 27 April 2016 EC (General Data Protection Regulation, published on 4 May 2016 in the Official Journal of the European Union, in force since 24 May 2016). It relates to this website of which **Leonardo Medica srl** is the Data Controller and does not extend to websites that may be referred to within the same website.

## 2. Legal sources - *What are the legal sources governing this policy?*

This notice complies with current legislation on the processing of personal data and in particular:

- Directive 2002/58/EC of 12 July 2002 (e-privacy directive) as amended by Directive 2009/136/EC of 25 November 2009;
- EU Regulation 2016/679 (GDPR);
- Legislative Decree no. 196 of 2003 and subsequent amendments and additions (with particular reference to art. 122)
- Opinion of the Working Group "Art. 29" n. 4/2012 on Cookie Exemption;
- Working Document of the Working Group "Art.29" n.02/2013 entitled "*Providing Guidance on obtaining consent for cookies*".
- Guidelines of the "Art 29" Working Party on consent under Regulation (EU) 2016/679 adopted on 10 April 2018, ratified by the European Data Protection Board on 25 May 2018 and replaced by *Guidelines 05/2020 on consent under Regulation 2016/679* adopted on 4 May 2020;
- the Provision of the Authority for the Protection of Personal Data of 8 May 2014 entitled "Identification of the simplified procedures for policy and acquisition of consent for the use of cookies";
- FAQ on policy and consent for the use of cookies of 3 December 2014;
- Clarifications on the implementation of the legislation on cookies published by the Authority for the Protection of Personal Data on the website [www.garanteprivacy.it](http://www.garanteprivacy.it);
- the Cookie and Other Tracking Tools Guidelines adopted by the Personal Data Protection Authority on 10 July 2021 (published in the Official Gazette) which supplements the provisions contained in the Measure of 8 May 2014

## 2. Definition and types of cookies - *What are cookies?*

### 2.1. What are cookies?

Cookies are small text files that are stored on the user's computer or mobile device when the user visits a website.

While browsing, the user may receive on his/her terminal equipment (computer, tablet, smartphone, etc.) not only cookies that are sent by the website he/she is visiting but may also receive them from other websites or web servers (so-called "third parties").

Cookies are used for many different purposes: from purely technical reasons (aimed, for example, at making navigation easier and smoother), it is possible, through their use, to carry out actual profiling activities (i.e. aimed at defining trends, tastes or behavioural patterns relating to a certain party in order to make advertising messages addressed to that party more effective).

## 2.2. What types of cookies are there?

Generally speaking, cookies can be divided into three main categories: a) "Technical" cookies; b) "Analytical" cookies; c) "Profiling" cookies.

### a) Technical cookies

These are cookies that are used to make navigation possible or to provide a service requested by the user.

Without them, in fact, some operations could not be carried out at all on the site or would be more complex (and sometimes less secure).

Another characteristic of this type of cookie is that they are not used for purposes other than those indicated, and are normally installed by the owner (or manager) of the website.

### b) Analytics Cookies

These are cookies that are used to monitor the use of the site by users for the purpose of optimising it (e.g. to collect information, in aggregate form, on the number of users and how they visit the site). Please note that they are assimilated to technical cookies only when they are created and used directly by the first party website and without, therefore, the intervention of third parties [for a clearer explanation between first and third party cookies, see below];

### Profiling cookies

Profiling cookies are designed to create user profiles and are employed to send advertising messages in line with the preferences shown by the same whilst surfing the net.

Due to their particular invasiveness of the user's private sphere, these tools require the user's (informed) consent to be installed on their terminal.

### **Proprietary Cookies and Third Party Cookies**

A further differentiation involves the party that installs cookies on the user's terminal. Visiting a web page, in fact, one can receive cookies both from the manager of the site visited (in this case we will speak of "**Proprietary**", "**first party**" or **Publisher cookies**) and from sites managed by other organisations (**so-called**

"**Third Parties**"). An example of the latter category is the Google Analytics service.

## 2.3. Cookies and request for express consent

Under current Italian law, the installation of cookies does not always require the user's express consent.

While express consent is not necessary for so-called technical or first-party analytical cookies, it is required in the case of profiling cookies.

As far as third-party analytics cookies are concerned, one must distinguish whether:

- a) tools are adopted that reduce the identifying power of the cookies and the third party does not cross-reference the information collected with other information it already has. In this case, the user's consent is not required;
- b) tools that reduce the identification power of cookies are NOT adopted and the third party does not cross-reference the information collected with other information it already has. In this case the user's consent is necessary.

## 3. Types of cookies used by the site - *What types of cookies are present on this site?*

Below we identify the individual cookies present on the [www.leonardomedica.it](http://www.leonardomedica.it) website, describing their characteristics and the reason they are installed.

In particular, the site uses the following types of cookies:

- a) Technical (indicated in the "Technical" section);
- b) Analytical (indicated in the "Analytical" section).

Please note that the Company Helaglobe S.r.l. does not act as Data Controller with regard to the data deriving from the category indicated at letter b) as these are merely technical intermediaries.

In the following chart, the user can check the specific characteristics of the cookies present on the website **www.leonardomedica.it** in order to allow him/her to make an informed decision on whether to consent to their use and which cookies, if any, to block or delete.

<b>Technical ()</b> <b>[Proprietary]</b>		
<b>First Name</b>	<b>Supplier</b>	<b>Purpose</b>
_gat_gtag_UA_83812418_1	.leonardomedica.it	/
mailchimp.cart.current_email	.leonardomedica.it	/
mailchimp.cart.previous_email	leonardomedica.it	/
woocommerce_cart_hash	leonardomedica.it	/
woocommerce_items_in_cart	leonardomedica.it	/
wordpress_logged_in_8558bdc9c56c311cbc71ef36e006233d	leonardomedica.it	/
__stripe_mid	leonardomedica.it	/
__stripe_sid	leonardomedica.it	/

<b>Analytic ()</b> <b>[Third Party]</b>			
<b>First Name</b>	<b>Supplier</b>	<b>Purpose</b>	<b>Duration</b>
_GRECAPTCHA	www.google.com	/recaptcha	180
IDE	.doubleclick.net	/	390
_gid	.leonardomedica.it	/	1
_ga	.leonardomedica.it	/	730
_gcl_au	.leonardomedica.it	/	90
mailchimp_landing_site	leonardomedica.it	/	28
pum-2029	leonardomedica.it	/	7
wp-wpml_current_language	leonardomedica.it	/	1
wp_woocommerce_session_8558bdc9c56c311cbc71ef36e006233d	leonardomedica.it	7	2
_iub_cs-52785376	leonardomedica.it	/	365
_iub_cs-68011257	leonardomedica.it	/	12
Link to privacy policy	<a href="http://www.google.com/intl/it/policies/privacy/">http://www.google.com/intl/it/policies/privacy/</a>		

With regard to third-party analytical cookies, and in particular those transmitted by Google Analytics, the following should be noted. Google Analytics is a web traffic analysis service provided by the company Google, Inc., which uses cookies both to collect and analyse information on how the website **www.leonardomedica.it** is used and to compile reports and share them with other services developed by Google Inc. itself.

However, Google Inc. allows website operators to request the anonymisation of all users' IP addresses. This is in fact made possible by providing website operators with a technical tool that they can insert on their website.

In this way, the owners of websites using Google Analytics can set the programme to use only part of the IP address.

Please refer to the following links for further information and details:

- <https://support.google.com/analytics/answer/2763052?hl=it>

**Leonardo Medica srl** has not/has requested Google Inc to anonymize IP addresses and has not/has, therefore, adopted procedures to prevent Google Inc. from "cross-referencing" Google Analytics information with other data in its possession.

Finally, please note that the user can selectively disable the action of Google Analytics by installing the opt-out component released by Google on his/her browser. For further information and to disable the action by Google Analytics, please refer to the link: <https://tools.google.com/dlpage/gaoptout>

#### **4. Need for consent - *Is consent required for the installation of cookies?***

We do not require your consent to install technical cookies. On the other hand, for non-anonymised third-party analytical cookies, the user's consent is required.

#### **5. Acquiring consent - *How do I consent to the installation of analytical cookies?***

The user can consent to the installation of analytical cookies in various ways and at various times.

In particular, consent can be given by:

- a) clicking on the "Accept All" button present in the information banner visible when the website is first viewed (so-called short cookie policy);
- b) clicking on the "Manage Preferences" button in the short cookie policy and activating analytical cookies;
- c) activating analytical cookies through the link visible in the footer of the page that calls up the Preference Management Panel ("Preference Management");
- d) activating analytical cookies via the link below [link];

#### **6. Managing cookies - *How do I manage cookies?***

The User, at any time, has the option to deactivate third party analytical cookies either completely or selectively.

This operation is possible through the specific preference management panel or through the browser settings.

With particular reference to browser settings, please pay particular attention to how you disable cookies.

This may, in fact, entail different consequences depending on the type of cookies.

While the non-acceptance/deactivation of analytical cookies does not affect the navigation on the website [www.leonardomedica.it](http://www.leonardomedica.it), the same operation applied to technical cookies (or similar) may instead compromise the navigation functionality.

As regards the management of settings, each browser has different procedures for disabling cookies. To facilitate the user, please refer to the specific instructions of the most common browsers through the following links:

- **Microsoft Windows Internet Explorer** : <https://support.microsoft.com/it-it/windows/eliminare-e-gestire-i-cookie-168dab11-0753-043d-7c16-ed5947fc64d#ie=ie-11>
- **Microsoft Edge** : <https://support.microsoft.com/it-it/help/4027947/windows-delete-cookies>
- **Google Chrome**: <https://support.google.com/chrome/answer/95647?hl=it>
- **Mozilla Firefox**: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- **Safari**: <https://support.apple.com/it-it/guide/safari/sfri11471/mac>

#### **7. Navigation data - *What are they?***

Navigation on the website also involves the processing of navigation data. This term refers to those personal data that are collected by the site's computer system and whose transmission is implicit in the use of internet communication protocols. These are data

relating to the use of the site and browsing which, although collected in order not to be associated with the User, could - under certain circumstances - allow the User to be identified through particular processing with data held by third parties. By way of example and without limitation, these are:

- IP addresses, domain names, navigation data and any other data concerning the User's interaction with the site;
- the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the User's operating system and computer environment, the data relating to the devices and/or computers used by the User to access the platform, including the type of browser, the unique code of the device, the language, the operating system, the reference web page;
- the name of the internet service provider (ISP).

### **8. Legal notes - *What is important to know?***

In accordance with the provisions of Article 122(2) of Legislative Decree no. 196/2003 (as amended by Legislative Decree no. 101/2018) and in accordance with the provision of the Privacy Guarantor of 8 May 2014 [doc. web: 3118884] published in Gazzetta Ufficiale on 3 June 2014, and *Linee Guida cookies ed altri strumenti di tracciamento* adopted by the same Authority on 10 July 2021 this web page is visible, via a special link, at the bottom of each page of the website **[www.leonardomedica.it](http://www.leonardomedica.it)**.

Please note that the installation of cookies (or similar technologies) by third parties through the services used on the website **[www.leonardomedica.it](http://www.leonardomedica.it)** cannot be controlled by **Leonardo medica srl**.

Therefore, any specific reference to third-party cookies (or similar technologies) is purely by way of indication, and the user is strongly advised to read the privacy policies and/or cookie policies of the third-party services as listed in this document with specific reference to the links indicated.

We remind you that the indication of the links to the websites present in this text may be subject to changes over time by the third party companies to which they refer. It is therefore always advisable to read them carefully.

For any request for clarification and/or further information, the User is invited to contact the Data Controller at the addresses indicated in the privacy policy.

This cookie policy was last updated on 14/12/2021