

COOKIE POLICY

COOPSELIOS Cooperativa Sociale S.C., (Tax Code and VAT No.: 01164310359) (hereinafter "COOPSELIOS"), in the person of its pro tempore legal representative, with registered office in Reggio Emilia, via A. Gramsci, 54/S, in its capacity as Data Controller pursuant to Articles 4(7) and 24 of EU Regulation No. 2016/679 (GDPR), hereby sets out its cookie policy (the "Policy") applicable solely to this website www.coopselios.com (the "Website").

1. Legal framework of reference.

1.1. The Policy is based on the following EU and/or national regulatory provisions (first and/or second level): (i) Directive No. 2002/58/EC of 12 July 2012 (the so-called ePrivacy Directive), as amended by Directive No. 2009/136/EC; (ii) Article 122 of the amended Legislative Decree No. 196/2003 (Privacy Code), which transposed the ePrivacy Directive into national law; (iii) GDPR: Articles 4(11), 7, 12, 13, 25 and 95 (in addition, in particular, to Recitals 30, 32 and 173); (iv) Guidelines No. 5/2020 adopted on 4 May 2020 by the EDPB, replacing the Guidelines of 10 April 2018 signed by WP Art. 29; (v) Provision No. 231 of 10 June 2021 [web doc. No. 9677876] signed by the Italian Data Protection Authority (Garante Privacy); (vi) Recommendation No. 2/2001 of the WP Art. 29; (vii) Opinion No. 2/2010 of the WP Art. 29; (viii) Opinion No. 4/2012 of the WP Art. 29; (ix) Guidelines No. 8/2020 of the EDPB; (viii) Measures No. 224 of 9 June 2022 [web doc. No. 9782890], No. 243 of 7 July 2022 [web doc. No. 9806053] and No. 254 of 21 July 2022 [web doc. No. 9808698] signed by the Data Protection Authority.

2. Cookies and other tracking tools: definition and classification.

2.1. Cookies¹ are, as a rule, strings of text that a website ('publisher' or 'first party') visited by the user or a different website ('third party') places and stores, directly (in the case of the first-party website) or indirectly (through the latter, in the case of the third-party website), on a terminal device available to the user. In this regard, the Data Protection Authority has specified that the information encoded in cookies may include both personal data pursuant to Article 4(1) of the GDPR (e.g. IP address, username; email address; unique identifier) and non-personal data pursuant to Article 3(1) of EU Regulation No. 1807/2018 (e.g. language; type of device used).

Alongside (or in addition to) these, there may be (and therefore be used) '**other tracking tools**', which can be divided into 'active' (which have almost the same characteristics as cookies) and 'passive' (e.g. fingerprinting).

¹ See Recital 30) of the GDPR ("Natural persons may be associated with online identifiers generated by the devices, applications, tools and protocols they use, such as IP addresses, temporary markers (cookies) or other identifiers, such as radio frequency identification tags. Such identifiers may leave traces which, in particular when combined with unique identifiers and other information received from servers, may be used to create profiles of natural persons and identify them"), and Article 122(1) and (2) of the Privacy Code ("1. The storage of information in the terminal equipment of a contractor or user or access to information already stored is permitted only on condition that the contractor or user has given their consent after being informed in a simplified manner. This does not prohibit the technical storage or access to information already stored if it is for the sole purpose of carrying out the transmission of 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 contractor or user to provide that service. For the purposes of determining the simplified methods referred to in the first sentence, the Guarantor shall also take into account the proposals made by the most representative national associations of consumers and economic categories involved, also with a view to ensuring the use of methods that guarantee the effective awareness of the contractor or user. 2. For the purposes of expressing the consent referred to in paragraph 1, specific configurations of computer programs or devices that are easy and clear to use for the contractor or user may be used..."); see also page 15) of Provision No. 231 of 10.6.2021 signed by the Privacy Guarantor: "...to date, there is still no universally accepted system of semantic coding of cookies and other tracking tools that allows for an objective distinction to be made, for example, between technical cookies and analytics or profiling cookies, other than on the basis of the information provided by the data controller in the privacy policy [...] the hope is that a general coding system will be agreed upon quickly".

2.2. Beyond the intrinsic characteristics described above, cookies (and other tracking tools) may have different characteristics in terms of time (and therefore be considered 'session'² or "permanent"³, depending on their duration), from a subjective point of view (depending on whether the publisher acts independently or on behalf of a "third party") and, finally (but in particular), based on the purpose of the processing pursued, so that they can be divided into two different (macro) categories:

- ✓ "technical", used for the sole purpose of "carrying out the transmission of 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 contractor or user to provide that service" (Article 122(1) of the Privacy Code).
- In this regard, the Privacy Guarantor has highlighted, in Provision no. 231 of 10.6.2021 (in line with the previous Provision on the subject of 2014), that "**analytics cookies**"⁴ may well be included within the scope of cookies (or other tracking tools) of a "technical" nature (and, therefore, may be used without the prior consent of the data subject), under certain conditions, aimed at precluding the possibility that their use could lead to the direct identification of the data subject (single out)⁵.
- ✓ "**profiling**"/"**marketing**" **cookies** (so-called non-technical cookies), used to trace specific actions or recurring behavioural patterns in the use of the features offered (patterns) back to specific, identified or identifiable individuals, in order to group the various profiles into homogeneous clusters of varying sizes, so that the Data Controller can, , among other things, to tailor the provision of the service in an increasingly personalised manner beyond what is strictly necessary for the provision of the service, as well as to send targeted advertising messages (i.e., in line with the preferences expressed by the user when browsing the web).

3. Cookies installed on the Website.

² Cookies designed to collect and store data while a user accesses a website, and disappear once the user has closed the relevant browsing session.

³ Cookies designed to last for a predetermined period of time (e.g. minutes, months, years).

⁴ Analytical cookies are usually used to evaluate the effectiveness of an information society service provided by a publisher, to design a website or, finally, to help measure its traffic (i.e. the number of visitors, possibly broken down by geographical area and time of connection).

⁵ See Provision No. 231 of 10.6.2021 signed by the Privacy Guarantor, pp. 13/14: "The structure of the analytics cookie must therefore allow for the possibility that it may refer not only to one but to several devices, so as to create reasonable uncertainty about the digital identity of the person receiving it. As a rule, this effect is achieved by masking appropriate portions of the IP address within the cookie. Taking into account the representation of 32-bit IP version 4 (IPv4) addresses, which are usually represented and used as a sequence of four decimal numbers between 0 and 255 separated by a dot, one of the measures that can be implemented in order to benefit from the exemption is to mask at least the fourth component of the address, an option that introduces an uncertainty in the attribution of the cookie to a specific data subject equal to 1/256 (approximately 0.4%). Similar procedures should be adopted with regard to IP version 6 (IPv6) addresses, which have a different structure and a vastly superior addressing space (being made up of binary numbers represented with 128 bits). The Data Protection Authority also emphasises the need for the use of analytics cookies to be limited solely to the production of aggregate statistics and for them to be used in relation to a single website or a single mobile application, so as not to allow the tracking of the browsing of persons who use different applications or browse different websites. It is therefore understood that third parties providing web measurement services to publishers must not combine the data, even if minimised, with other processing (e.g. customer files or statistics on visits to other sites) or transmit it to other third parties, as this would lead to an unacceptable increase in the risk of user identification. except in cases where the statistics they produce with the minimised data concern multiple domains, websites or apps attributable to the same publisher or business group. However, even in the absence of the prescribed minimisation measures, it is possible to consider lawful the use of statistical analyses relating to multiple domains, websites or apps attributable to the same data controller is considered lawful, provided that the data controller carries out the statistical processing itself and that such analyses do not result in an activity that, going beyond the boundaries of a mere statistical count, actually takes on the characteristics of processing aimed at making commercial decisions.

3.1. The following types of cookies have been installed (or may be installed, subject to obtaining the user's specific consent) on the Website:

Name	Type	Function	First/Third party	Duration	Type
_uetSID	Analytical	Stores and monitors visits to the site.	Third party (cookiebot)	Session	HTML Local Storage
_clsk	Analytical	Stores and combines the user's views of a page on the website into a single session record.	Third party (cookiebot)	Session	HTML Local Storage
_uetvid	Analytical	Stores and combines the user's views of a page on the website into a single session record.	Third party (cookiebot)	1 year	HTML Local Storage
_clk	Analytical	Stores a unique ID.	Third party (cookiebot)	1 year	HTML Local Storage
Visitor_info_1_live	Technical Analytical	Attempts to estimate user speed on pages with embedded YouTube videos.	Third party (YouTube)	180 days	HTTP cookie
ysc	Analytical	Records a unique ID for statistics related to which YouTube videos the user has viewed.	Third party (YouTube)	Session	HTTP cookie
Yt-remote-cast-installed	Analytical Profiling	Stores the user's video player preferences using the embedded YouTube video.	Third party (YouTube)	Session	HTML Local Storage
Yt-remote-connected-devices	Analytics Profiling	Stores the user's video player preferences using the embedded YouTube video.	Third party (YouTube)	Persistent	HTML Local Storage
Yt-remote-device-id	Analytical Profiling	Stores the user's video player preferences using the embedded YouTube video.	Third party (YouTube)	Persistent	HTML Local Storage
Yt-remote-fast-check-period	Analytical Profiling	Stores the user's video player preferences using the embedded YouTube video.	Third party (YouTube)	Session	HTML Local Storage
Ytidb:LAST_RESULT_ENTRY_KEY	Analytical Profiling	Stores the user's video player preferences using the embedded YouTube video.	Third party (YouTube)	Persistent	HTML Local Storage
Yt-remote-cast-available	Analytical Profiling	Stores the user's video player preferences using the embedded YouTube video.	Third party (YouTube)	Session	HTML Local Storage
Consent	Technical	Stores the user's cookie consent status for the current domain.	Third party (Google) (YouTube)	2 years	HTTP cookie
CookieConsent Amp_Crossconsent	Technical	Stores the user's cookie consent status for the current domain.	First party Third party (cookiebot) Third party (cookiebot)	1 year 1 year 1 year	http cookie
Yt-remote-session-app	Analytical Profiling	Stores the user's video player preferences using the embedded YouTube video.	Third party (YouTube)	Session	HTML Local Storage

Yt-remote-session-name	Analytics Profiling	Stores the user's video player preferences using the embedded YouTube video.	Third party (YouTube)	Session	HTML Local Storage
Phpsessid	Technical	Preserves user status across different pages of the website.	First party	1 year	HTTP cookie
Yt-player-bandwidth Yt-player-headers-readable	Technical	Used to determine the optimal video quality based on the visitor's device and network settings.	First party	Persistent Persistent	HTML Local Storage
Qcses Qcsxl	Analytical	Collects data on user visits to the website, such as number of visits, average time spent on the site and pages loaded, in order to generate reports to optimise the content of the website.	First party	Session Persistent	HTML Local Storage
Sessionpagenumbers	Analytical	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes.	First party	Session	HTML Local Storage
Sessionstarttime	Analytical	Determines when the user last visited the various subpages of the site; the cookie inserts a timestamp at the start of the session.	First party	Session	HTML Local Storage
Iutk	Analytical	Recognises the user's device and which documents have been read.	First party	179 days	HTTP cookie
Pixel	Analytical	Collects information about user behaviour across multiple websites.	First party	Session	Pixel tracker
Mc	Analytical	Collects data on user visits to the website, such as which pages have been loaded.	First party	13 months	http cookie
Yt-remote-cast-available	Analytical Profiling	Stores the user's video player preferences using the embedded YouTube video.	Third party (YouTube)	Session	HTML Local Storage
_ga	Analytical	Records a unique ID used to generate statistical data on how visitors use the website.	First party	2 years	http cookie
ga#	Analytical	Used by Google Analytics to collect data on the number of times a user has visited the website, as well as data on the first visit and the most recent visit.	First party	2 years	http cookie
_fbp	Marketing	Used by Facebook to provide a range of advertising products such as real-time offers from third-party advertisers.	Third party (issuu)	3 months	http cookie
_glc_au	Technical Analytical	Used by Google AdSense to test advertising	Third party (issuu)	3 months	http cookie

		effectiveness on all websites that use their services.			
Remote_sid	Technical	Used for the implementation and functionality of YouTube video content on the website.	Third party (YouTube)	Session	HTTP cookie
Service worker logs database	Technical	Necessary for the implementation and functionality of YouTube video content on the site.	Third party (YouTube)	Persistent	IndexedDB
Testcookiesenabled	Analytical	Used to track user interaction with embedded content.	Third party (YouTube)	1 day	HTTP cookie
Ytldbmeta#databases	Analytical	Used to track user interaction with embedded content.	Third party (YouTube)	Persistent	IndexedDB
_gid	Analytical	Records a unique ID used to generate statistical data on how visitors use the site.	First party	1 month	HTTP cookie

4. Browser settings.

4.1. COOPSELIOS highlights the possibility for the user to delete and block the operation of the cookies described in Article 3 above at any time by using the appropriate settings within the browser used: in this regard, COOPSELIOS adds that, if the user decides to disable the technical cookies referred to in Article 2.2. point i), the quality and speed of the services and features offered and made available on the Website may deteriorate. Information on how to manage cookies with some of the most popular browsers can be found by visiting the following web pages:

<https://support.google.com/chrome/answer/95647?hl=it>
<https://support.mozilla.org/it/kb/Gestione%20dei%20cookie?redirectlocale=enUS&redirectslug=Cookies>
<https://support.microsoft.com/it-it/help/17442>
<https://support.microsoft.com/it-it/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>
<https://support.apple.com/it-it/guide/safari/sfrill471/mac>
<https://support.apple.com/it-it/HT201265>
<https://help.opera.com/en/latest/security-and-privacy/#clearBrowsingData>

Furthermore, COOPSELIOS indicates below the main web pages of the third parties described in Article 3 above:

<https://www.cookiebot.com>
<https://www.youtube.com>
<https://www.google.com>

5. Rights of the data subject.

5.1. With regard to the user's personal data, COOPSELIOS informs that the data subject pursuant to Article 4(1) of the GDPR has the right to exercise the following rights, which may be subject to the limitations provided for in Articles 2-undecies and 2-duodecies of the Privacy Code: right of access pursuant to Article 15 of the GDPR: the right to obtain confirmation as to whether or not personal data concerning the data subject are being processed, as well as the information referred to in Article 15 of the GDPR (e.g. purposes of processing, storage period); right to rectification pursuant to Article 16 of the GDPR: the right to correct, update or supplement personal data; right to erasure pursuant to Article 17 of the GDPR: right to obtain the erasure or destruction or anonymisation of personal data, where the conditions listed in the same article are met; right to restriction of processing pursuant to Article 18 of the GDPR: right with a markedly precautionary connotation, aimed at obtaining the restriction of processing where the conditions governed

by Article 18 itself are met; right to data portability pursuant to Article 20 of the GDPR: the right to obtain personal data provided to COOPSELIOS in a structured, commonly used and machine-readable format (and, where requested, to transmit it directly to another data controller), where the specific conditions indicated in the same article are met (e.g. legal basis of consent and/or performance of a contract; personal data provided by the data subject); right to object pursuant to Article 21 of the GDPR: right to obtain the permanent cessation of a specific processing of personal data; right to lodge a complaint with the Supervisory Authority (i.e., the Italian Data Protection Authority) pursuant to Article 77 of the GDPR: right to lodge a complaint where it is believed that the processing under analysis violates national and EU legislation on the protection of personal data.

5.2. In addition to the rights described in Article 5.1 above, COOPSELIOS specifies that, in relation to the personal data of the data subject, there is, where possible and appropriate, the right to exercise, on the one hand, the (sub) right provided for in Article 19 of the GDPR ("The controller shall communicate any rectification or erasure or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall communicate those recipients to the data subject upon request"), which is to be considered connected and related to the exercise of one or more rights regulated by Articles 16, 17 and 18 of the GDPR; on the other hand, COOPSELIOS specifies that, in relation to the personal data of the data subject, where possible and appropriate, the right provided for in Article 22(1) of the GDPR ("The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her"), subject to the exceptions provided for in paragraph 2 below.

5.3. In accordance with Article 12(1) of the GDPR, COOPSELIOS undertakes to provide the user with the communications referred to in Articles 15 to 22 and 34 of the GDPR in a concise, transparent, intelligible and easily accessible form, using clear and plain language: such information shall be provided in writing or by other electronic means or, at the user's request, shall be provided orally, provided that the user's identity is verified by other means.

5.4. In accordance with Article 12(3) of the GDPR, COOPSELIOS informs that it undertakes to provide the user with information regarding the action taken in response to a request pursuant to Articles 15 to 22 of the GDPR without undue delay and, in any case, no later than one month after receipt of the request; this period may be extended by two months if necessary, taking into account the complexity and number of requests (in this case, the Data Controller undertakes to inform the user of this extension and the reasons for the delay within one month of receiving the request).

5.5. The user may exercise the above rights at any time (with the exception of the right under Article 77 of the GDPR) by using the contact details provided in Article 6.

6. Contact details.

6.1. COOPSELIOS can be contacted at the following address: info@coopselios.com

6.2. The Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, appointed by COOPSELIOS, can be contacted at the following address: privacydpo@coopselios.it

7. Social plug-ins.

7.1. In compliance with EDPB Guidelines No. 7/2020, COOPSELIOS also specifies that it acts as joint controller pursuant to Articles 4(7) and 26 of the GDPR with certain social media providers (e.g. LinkedIn; YouTube), due to the installation of the relevant social plug-ins on the Website, which are easily viewable and usable on the Website.

Finally, COOPSELIOS specifies that the cookie banner displayed on the Website complies, as required by the Privacy Guarantor in its Provision No. 231 of 10 June 2021, with the 'AA' level success criteria, applicable in this case, of the 'Web Content Accessibility Guidelines' (WCAG) 2.1., a document referred to in Article 2.2. of the "Guidelines on the accessibility of IT tools" signed by AGID on 13 February 2020.

Reggio Emilia (RE), 30.1.2026 (date of last update).

COOPSELIOS Cooperativa Sociale S.C.
(in the person of its pro tempore legal representative)