



COOKIES POLICY

1. Introduction and purpose

The Company uses cookies and other similar technologies. Cookies are small text files that are recorded on your browsing device when you visit this site.

The Company uses cookies to collect information useful for evaluating and improving the functionality of its products and services, to measure their audience, as well as to offer content and advertising that is more in line with the interests and preferences of its users.

In particular, the Company uses cookies to:

- a. remember the login credentials of interested parties, who will thus not have to enter them at each access;
- b. evaluate how users use the services, in order to improve and evolve them;
- c. collect information on the interests, habits and preferences of interested parties, in order to propose personalized content and offers, also in order to improve the profitability of the services;
- d. show targeted advertising based on the interests of users and other indicators, in order to improve the profitability of the services;
- e. cross-reference the information collected with that of other owners with adequate consent, in order to refine the understanding of user habits and preferences and deliver targeted advertising;
- f. provide third parties with the information collected on the interested parties, to allow the cross-referencing of data aimed at delivering targeted advertising;
- g. keep track of the consent that the interested parties have given or denied, so as to carry out the processing for the different purposes only if specifically authorized.

The processing that pursues the purposes referred to in letters c), d), e), f), are based on the consent of the interested party. The purposes referred to in points a) and b) are based on the legitimate interest of the Owner, aimed at improving the functioning of its services, while the purpose referred to in point g) is based on the fulfillment of the legal obligations relating to the collection and storage of consent.

The aforementioned purposes are pursued through the activities described in detail below and in the Cookie Preferences panel.

2. Purposes subject to consent

The following purposes are part of an advertising industry standard called the IAB Transparency Framework:

- store and/or access information on a device;
- select ads/services;
- create a personalized ads/services profile;
- select personalized ads/services;
- create a personalized content profile;
- select personalized content;
- measure ads/services performance;
- measure content performance;
- apply market research to generate audience insights;
- develop and improve products/services;
- use precise geolocation data;
- actively scan device characteristics for identification.

3. Purposes subject to consent specific to the Company

- Create profiles for the purpose of customizing content and commercial offers

4. Technical purposes always active

This Website uses Cookies commonly called "technical" or other similar tracking tools to carry out activities strictly necessary to guarantee the operation or provision of the Services, to guarantee security and the correction of technical problems and improve the functionality of the Site.

5. Characteristics and features

To pursue one or more of the purposes listed above, the services (including those of authorized third parties) may:

- use precise geolocation data;
- actively scan the characteristics of the device for identification purposes;
- match and combine offline data sources;
- connect different devices;
- receive and use the characteristics that the device automatically sends for identification purposes.

6. Classes of cookies

Cookies can be divided into two categories: first-party cookies and third-party cookies.

First-party cookies are cookies set directly by the Company, or by technical suppliers acting in the interest of the Company, in the application or site that the interested party is using. These cookies can only be read by the application or site itself and are not visible to other parties who are not directly involved in the management of the site or application, who in this case act under the responsibility of the Data Controller.

Third-party cookies are cookies set by parties other than the Company, and over which the Company does not have direct control. Third-party cookies are, for example, those that the online advertising market uses to provide personalized advertisements. If the site or application contains content offered by third parties, these third parties may insert their own cookies to track how users use them. All third-party advertising or profiling cookies are subject to the consent of the interested party.

7. Use of cookies by the owner

The Company (directly or through contracted suppliers) or authorized third parties use the following types of cookies:

- functional cookies, used to store whether you have been shown the message for the collection of consent to the use of cookies, to keep track of your cookie consent choices, to keep track of the login (where available) and keep your authentication to the services active (where required); they are also used to keep track of user navigation in an aggregate and purely statistical way, to analyze which services work better than others, also in terms of the attention of those who use them. In particular, for these purposes the Company uses the Google Analytics platform;
- performance cookies, used to track more accurately the browsing statistics of all our users, to analyze the performance of the sites and applications; In particular, the Company uses the Google Analytics platform;

- commercial profiling cookies, aimed at developing a user profile in order of their interests, methods and habits of use of the contents, which allows us to improve our products and services and propose personalized contents and offers to our readers;
- advertising personalization cookies, through which our partners provide personalized advertising based on your browsing habits and preferences, as well as your rough geographic location (at most at city level) or other personal indicators collected with your consent, and specified in the description of the individual cookies contained in the preferences panel; In particular, the Company uses the Google Ad Manager advertising delivery platform.

8. Cookie storage

The duration of cookie storage is indicated in the preferences panel. Cookies defined as “session” are deleted as soon as you log out. They are used to contain information necessary to transport information from one page to another, allowing us to offer you complex services that develop on multiple pages and at multiple times.

9. What we mean by profiling and personalization

Profiling consists in the development of a user profile, in which information can be collected on the user's age group, gender, geographical area of origin, device used, habits of use of our services, interests, collected during your use of our sites or applications. This information is combined in "clusters", in order to create groups of users who share a similar profile.

Personalization means the offer of services, content or advertising that, based on statistical processing, are believed to be of interest to users belonging to a specific profile.

Thanks to profiling we can:

- make predictions about your interests and preferences;
- propose, also with alerts and notifications, content or subscription/purchase offers for our products that we think may interest you based on previous predictions;
- correct the prediction errors of previous analyses and improve the ability to be more precise in the future.

In the absolute absence of consent or in the absence of consents necessary to pursue the purpose, no personalization will be carried out and our products and services will be provided in their “general” mode, except as specified under “Free access and consentless subscription”.

Advertising profiling applies the same criteria described above in order to offer personalized advertisements. In this case, the data may also come from sites external to those of the Company, provided that these sites have collected your consent.

In the absence of consent, no personalization will be carried out and advertising will be proposed according to a generic schedule, except as specified under “Free access and consentless subscription”.

10. Free access and consentless subscription

The free offer of services is possible thanks to the support that sites and apps receive from advertised services. It is therefore possible that consent to the use of advertising profiling cookies is required in order to have access to such content, which is often free for basic services. As an alternative to consent, you can subscribe to a subscription upon payment of a small fee, the cost of which partially compensates for the loss of advertising revenue (a “consentless” subscription). The release of consent or the subscription to a consentless subscription give full access only to a limited

number of services or content, so if you are not a subscriber but have given optional consent to cookies, or if you have a consentless subscription, you will still not be able to access the services reserved for premium subscribers.

The economic sustainability of the free offer, being based on the profits generated by the primary services and is directly proportional to the share of users who grant optional consents.

When the Data Controller proposes a “login” with consent or “subscribe” formula, the acceptance of consent via the general acceptance button “Accept cookies” present in the information message upon first access to the site, will imply the activation of all the purposes based on the consent of the interested party, indicated in paragraph 1 of this information, and will allow access to free services, within the limits specified below. The same access to free services is possible if, by accessing the cookie preferences panel through the links in the cookie banner, or through the “Cookie preferences” link at the bottom of the Site page, you have given consent to advertising cookies (even if you have denied consent to the personalization of content and/or cookies grouped under the heading “Other marketing services”).

The offer of free services unlocked by the release of consent to advertising cookies, or articles available for consentless subscribers, is at least six articles for each month starting from the date of release of consent.

If you have released consent for personalized services, the browsing data collected by the Company with your consent will also be used to personalize the offer of content intended for non-subscribers who have consented to personalized advertising or consentless subscribers. Therefore, the Company may from time to time make a greater number of services accessible free of charge depending on objective factors (for example during off-peak hours) or personalized factors (such as the user's interests derived from the site of origin), in order to facilitate the sharing of some primary services. The list of data collected is as follows:

- Date/Time
- Article read
- Mapp Cookie ID
- Ceds Browser ID
- Platform/ Operating System
- Device
- Referrer (url of origin)
- Number of articles already read

The consents that are the basis for the customization of the offer, content and advertising, if given, can be revoked at any time by clicking on the "Cookie preferences" link (also present at the bottom of all pages of the site), and this will result in the cancellation of the profiling data collected.

If you refuse consent in full or in any case for the purposes of advertising personalization, access compensated by advertising investors will be inhibited, and you will be directed to one of our commercial offers, generally divided between "consentless" subscription and premium subscriptions.

In the absence of consent relating to the personalization of content and the offer, provided that the optional consent for advertising profiling cookies is active, or may be increased on the basis exclusively of non-personalized factors.

Please remember that the Site contains services reserved for premium subscribers only, not included in the offer of free content mentioned above, or in the "consentless" offer, and that only premium subscribers have access to all the contents of the Site.

11. Subscribed users

Having subscribed to a consentless subscription, or having, as a premium subscriber, denied consent to optional cookies, does not mean that the site or app are free of advertising. In this case, the Data

Controller will provide non-profiled advertising.

At any time, even after deleting cookies, if you are the holder of an active subscription, you can avoid having to choose the consents to provide again, simply by accessing the service with your credentials.

If you are subscribed to a premium offer of the Data Controller, and have provided the related optional consents, personalized content or advertising will also be provided through the site or app, in line with the consent given.

If you are a consentless subscriber, you will not be presented with a banner requesting consent to advertising profiling cookies, except in the case of particular technical situations (e.g. voluntary cancellation of all cookies). In this case, you may refuse all or part of the optional consents and continue browsing.

12. Management of consent to cookies

Upon first access to a site or application of the Company or in any case after 180 days from the last expression of consent or immediately after the voluntary cancellation of cookies, you will be shown an information banner through which you will be able to:

- read this extended information on the use of cookies by the Data Controllers (link “Cookie policy” in the text of the banner);
- fully accept the use of cookies by the Data Controllers and third parties (“Accept” button);
- fully refuse the use of cookies by the Data Controllers and third parties (“Continue without accepting”);
- individually select the cookies to accept and reject (link “Cookie preferences”).

If you click on the “Continue without accepting” button, you can choose between the “consentless” or premium subscription proposals.

The provision of consent is free, even when refusal involves the total or partial impossibility of accessing the site or app, as the service is fungible, as there are numerous sources of supply of the same news and services beyond those offered by the Data Controller.

If you do not wish to accept or reject consent in full, you can freely and individually choose the purposes that you accept and reject as well as the individual advertising partners that you wish to enable or disable, by clicking on the “Find out more and customize” button in the information pop-up that appears when you first access the site or whenever you delete cookies.

You can also always change your choices by accessing the choices customization panel through the “Cookie preferences” link, also present at the bottom of all pages of the Site.

Through the customization panel you can:

- individually select or deselect the cookies proposed by the Owners and their partners;
- activate all cookies in one action, by pressing the “Accept all” button;
- deactivate all cookies in one action, by pressing the “Reject all” button;
- save the chosen configuration by pressing the “Save and continue” button;
- close the window without changing anything, by pressing the “Back” button.

However, if through this tool you revoke one or more consents to the advertising purposes that allow free access to the site or app, and/or inhibit the suppliers required for the pursuit of these purposes, you will be directed to a paid offer. This unless you subsequently decide to give your consent again, or to use one of the alternative information services offered on the market by third parties not linked to the Owner.

For your protection, the consent is automatically deleted after 180 days from collection. In this case we will ask you again to confirm or deny it.

If you have denied consent, in the absence of voluntary changes to your device and browser settings (e.g. deleting cookies or activating automatic functions for periodic deletion of cookies) that may

affect our ability to track your response, we will not ask for consent again until 6 months have passed since your denial.

13. Consequences of refusing consent

As a subscriber, refusing consent to profiling for content personalization will not allow you to access personalized content and offers, while if you deny consent to advertising personalization cookies, you will see standard generic advertising intended for anyone and the advertising messages will be general ones offered in the same way to all users, without taking into account their tastes and preferences.

If you are not a subscriber and deny consent to profiling for advertising personalization, you will not be able to continue browsing and will be redirected to a subscription offer that compensates for the lack of remuneration and coverage of the production and management costs of the service.

14. Contacts, clarifications, exercise of rights

The data controller is the British company itself with offices in: 14/2E Docklands Business Centre - 10-16 Tiller Road - London. E14 8PX U.K. and operational office in Vul. Stryjska, 94/5 Lviv, 79026 Ukraine

In the dedicated person of dr. Clementine Henriette, also legal representative of this company

To receive further information regarding the use of cookies and tracking technologies on this site, you can contact the Data Controller

To request further clarifications on this information at the following addresses:

privacy@garofalo.club

To exercise your rights regarding the processing of personal data, you can refer to the paragraph

"YOUR RIGHTS IN MATTER OF PERSONAL DATA" of the Privacy Policy

TO EXPRESS YOUR PREFERENCES: Cookie preferences

This Cookie Policy is updated to 20 May 2022