

## **COOKIE POLICY**

### **1. INTRODUCTION**

This information on cookies and other tracking tools explains to our users the types of cookies, how they work and other tracking tools served by our website and also explains what actions to take to reject or delete them.

G&P COSMETICS SRL acts as a mere technical intermediary for the links provided by third parties and shall not be liable in the event of their potential modification by the respective Owners/Editors.

### **2. DEFINITIONS AND CLASSIFICATIONS**

#### **2.1 Cookies**

As commonly known, cookies are usually text strings that websites (the so-called Publishers, or "first parties") visited by the user or different websites or web servers (so-called "third parties") place and store – directly, in the case of publishers and indirectly, that is, through the latter, in the case of "third parties" – on a terminal available to the user.

The terminals referred to are, for instance, a computer, a tablet, a smartphone or any other device capable of filing information. Already now, and even more so in the future, it is necessary to include so-called IoT (Internet of Things) devices, which are designed to connect to the internet and provide various kinds of services, not necessarily limited to mere communication. The software used to surf the internet and operate these devices, such as browsers, can store cookies and then transmit them again to the websites that generated them on a subsequent visit by the same user, thereby remembering information about their previous interaction with one or more websites. The information encoded in cookies may include personal data, such as an IP address, a username, a unique identifier or an e-mail address, but it may also contain non-personal data, such as language settings or information about the type of device a person is using to navigate the website. Cookies can therefore perform important and different functions, including monitoring sessions, storing information on specific configurations concerning users who access the server, facilitating the use of online content, etc. For instance, they can be used to keep track of articles in an on-line purchase basket or of the information used to fill in a form on-line. While on the one hand cookies are responsible for allowing web pages to load more quickly, among other things, and to route the information on a network – in other words in keeping with the obligations strictly connected to the operation of websites –, cookies are also responsible for carrying out so-called "behavioural advertising" and then measure the effectiveness of the advertising message or conform the type and methods of services provided to the behaviour of users previously observed.

Since it is not possible to distinguish cookies based on their technical characteristics, they can be divided as explained below.

The main subdivisions concern:

- the origin, depending on which are identified:
  1. first-party cookies, which are installed on the user's terminal directly by the website operator;
  2. third-party cookies, installed by a different website through the operator of the website that the user is visiting;
- - the function pursued by cookies, based on which we have:
  - technical cookies that are used for the sole purpose of "carrying out the transmission of communications on an electronic communication network, or as strictly necessary to the provider of an information society service explicitly requested by the contractor or user to provide this service" (see Art. 122, paragraph 1 of Leg. Decree 196/03). Consent is not required for these cookies.

- profiling cookies used to refer to specific, identified or identifiable subjects, specific actions or behavioural patterns recurring in the use of the features offered (patterns) in order to group the different profiles within homogeneous clusters of different sizes, so that it is also possible for the owner, among other things, to modulate the provision of the service in an increasingly personalised way 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 in the context of online browsing. These cookies can only be used with the consent of the data subject, which also constitutes the legal basis for the processing. The user can never be forced, without an alternative, to express their consent to the receipt of cookies or other tracking tools, under penalty of being unable to access the website.

- There are also analytics cookies that perform analysis and statistics on the use of the website and on the flow of internet surfers. These cookies fall into the category of technical cookies if, through their use, the interested party cannot be directly identified (the so-called "single-out" option), which is equivalent to preventing the use of analytics cookies that, due to their features, can be direct and unique identifiers.

Analytics cookies also fall into the category of technical cookies if the use of statistical analyses relating to multiple domains, websites or apps is attributable to the same data controller, provided that they proceed themselves to the statistical processing. In any case, these analyses must not result in an activity that, going beyond the boundaries of a mere statistical count, actually takes on the characteristics of a processing aimed at making commercial decisions.

The legal basis for the processing is that of technical cookies if they fall into this category or consent if they do not fall into this category.

## **2.2 Other tracking systems**

There may also be other technologies through which the same purposes of cookies are pursued.

For instance, although cookies can be used in both web and mobile browsers, it would be inappropriate to talk about cookies in the context of mobile applications since these are tracking tools that require the presence of a browser. For this reason, within this document, the term Cookie is only used to refer specifically to that particular type of Tracking Tool. The same criteria used for cookies apply for these technologies

## **2.3 Coding criteria**

Below are the criteria through which tracking tools (which therefore also include cookies) are included under predefined categories.

Strictly necessary – always active except for the right for the user to block them through the settings on their browser: tools used to ensure the correct operation of the website. These tools do not store personal information. Their use does not require consent from the user. Without these cookies, the website may not work properly. The legal basis for the processing of these cookies is the legitimate interest in making the website work properly. They fall within the definition of technical cookies

Improving user experience: used to promote the effective use of the website by the user and thus promote a customised browsing experience. These tools can only be used with the user's consent. Without these tools, you can still browse the website without any problem or restriction except that of not being able to use the features that employed by this type of tool. The legal basis for data processing of such tools is consent.

Measurement – always active except for the right for the user to block them through the settings on their browser: used to count visits, required to improve the performance of our website. The data is collected in an anonymous and aggregated form and therefore its use does not require the consent of the user. Without these tools, you can still browse the website without any problem or

restriction. The legal basis for the processing of data for these tools is the legitimate interest in improving the performance of the website. However, if all is done anonymously, no data processing takes place. They fall within the definition of analytics cookies.

### 3. LIST OF COOKIES, TRACKING SYSTEMS AND PURPOSES

#### 3.1 Strictly necessary

List and storage time:

Cookies/other tool	First or third party	Company and privacy policy	Purpose	Retention time
viewed_cookie_policy	First party	G&P Cosmetics	This cookie is set by the GDPR Cookie Consent plugin to remember whether the user has allowed the use of cookies. It does not store any personal data.	1 year
cookie_law_info_checkbox_performance	First party	G&P Cosmetics	This cookie is set by the GDPR Cookie Consent plugin to remember whether the user has allowed the use of cookies in the "Improving the experience" category.	1 year
cookie_law_info_checkbox_non-necessary	First party	G&P Cosmetics	This cookie is set by the GDPR Cookie Consent plugin to remember whether the user has allowed the use of "Strictly Necessary" cookies.	1 year
cookie_law_info_checkbox_analytics	First party	G&P Cosmetics	This cookie is set by the GDPR Cookie Consent plugin to remember whether the user has allowed the use of cookies in the "Analytics" category.	1 year

#### 3.2 Improving user experience

Cookies/other tool	First or third party	Company and privacy policy	Purpose	Retention time
_gat	Third party	Google ( <a href="https://policies.google.com/privacy?hl=it-IT">https://policies.google.com/privacy?hl=it-IT</a> )	This cookie is installed by Google Universal Analytics to limit the rate of demand and	1 minute

			therefore limit the collection of data on high-traffic websites.	
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### 3.3 Analysis

Cookies/other tool	First or third party	Company and privacy policy	Purpose	Retention time
_ga	Third party	Google ( <a href="https://policies.google.com/privacy?hl=it-IT">https://policies.google.com/privacy?hl=it-IT</a> )	The _ga cookie installed by Google Analytics calculates visitor, session and campaign data and also keeps track of website usage for the website's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	2 years
_gid	Third party	Google ( <a href="https://policies.google.com/privacy?hl=it-IT">https://policies.google.com/privacy?hl=it-IT</a> )	Installed by Google Analytics, the cookie _gid stores information about how visitors use a website, also creating an analytical website performance report. Some of the data collected includes the number of visitors, their source, and the pages they visit anonymously.	1 day

Google Analytics is a web analytics service provided by Google Ireland Limited ("Google"). Google will use the Personal Data collected for the purpose of evaluating your use of this Website, compiling reports and sharing them with other services provided by Google.

Google may use your Personal Data to contextualize and customize ads in its advertising network.

This Google Analytics integration makes your IP address anonymous. Anonymisation works by shortening the IP address of the Users within the member states of the European Union or in other countries that are parties to the Agreement in the European Economic Area. Only in exceptional cases will the IP address be abbreviated and sent to Google's servers in the United States.

On 23/06/2022 the Italian Privacy Protection Authority stated that the use of Google Analytics might involve the transfer of some data to the United States that does not ensure sufficient protection against access by public authorities to the data transferred to that country. The Company expects to implement any necessary changes provided for by the Authority within the 90 days; to ensure maximum protection of the user, please

accept this type of cookies explicitly and freely. By accepting these cookies, the user accepts that the data may also be transferred by Google to the United States. The user is free to accept or not to accept these cookies without consequences.

#### **4. DATA CONTROLLER AND DATA PROTECTION OFFICER**

The data controller is: **G& P COSMETICS SRL**, with registered office in via L. Mascheroni 27 – 20145 Milan (MI-Italy), Tax Code, VAT No. and Milan Companies' Register No. 04778640963, MI EAI 1771789, Share Capital € 62,500.00 fully paid up, a company subject to the direction and coordination of AGF88 Holding S.r.l., Tel. +39.0575.720.682, info@gpcosmetics.it

To date, it is not required and necessary by law for the Company to have a data protection officer who, if necessary, will be disclosed through the website <https://www.gpcosmetics.it/> of the Company; please visit the website on a regular basis also for any updates on this policy.

#### **5. RIGHTS**

We hereby inform you that under the GDPR, the Data Controller can request from the company (at the above addresses) access to personal data, its correction, cancellation or the limitation of the processing that concerns them, as well as data portability; the data subject may also object to the processing of data and exercise the other rights contained in chapter 3, section 1 of the GDPR, including the right to withdraw their consent, where provided for: withdrawing your consent does not affect the lawfulness of the processing based on the consent given before the withdrawal.

#### **6. COMPLAINTS:**

If they believe that the processing concerning them violates the provisions of the GDPR and privacy regulations, users can always file a complaint with the Italian Data Protection Authority whose contact details can be found at [www.garanteprivacy.it](http://www.garanteprivacy.it).

#### **7. COMMUNICATION OF DATA**

The data may only be processed by personnel, including contractors, authorised to do so (IT technicians, consultants, IT technicians and consultants in charge of website management – marketing staff, website management staff who are responsible for the sectors to which a request is addressed) and by data controllers specifically appointed (for example companies that manage the website or where the website resides). The list of data processors can be found by contacting the data controller. All the above subjects only process the data strictly required to perform their tasks.

If needed, the data may also be transmitted by the Company to judicial bodies or the police, lawyers and anyone else required to comply with obligations provided for by law, by a regulation or by EU legislation or to assert or defend a right in the appropriate premises.

#### **8. FURTHER PURPOSES**

Please note that all data may always be processed to assert or defend a right of the company in the appropriate premises and in line with all the obligations provided for by law, a regulation or EU legislation. Bear in mind that in this sense the provision is an essential requirement and failure to provide the data will make it impossible to access the website and/or establish any relationship with the company (even by simply writing an e-mail to request information) and that for these purposes the data may be communicated to judicial bodies or the police, lawyers and anyone else necessary to fulfil obligations provided for by law, a regulation or EU legislation or to assert or defend a right in the appropriate premises.

#### **9. HOW TO DISABLE COOKIES DIRECTLY FROM YOUR BROWSER**

- Chrome → <https://support.google.com/chrome/answer/95647?hl=it>
- Internet Explorer → <http://windows.microsoft.com/it-it/internet-explorer/delete-manage-cookies#ie=ie-11>
- Opera → <http://help.opera.com/Windows/10.00/it/cookies.html>

- Safari for mobile devices → [http://support.apple.com/kb/HT1677?viewlocale=it\\_IT](http://support.apple.com/kb/HT1677?viewlocale=it_IT)
- Safari desktop version → [https://support.apple.com/kb/PH19214?locale=it\\_IT](https://support.apple.com/kb/PH19214?locale=it_IT)
- Firefox → <https://support.mozilla.org/it/products/firefox/protect-your-privacy/cookies>
- Microsoft Edge → <http://windows.microsoft.com/it-it/windows-10/edge-privacy-faq>

If you are using a Web browser that is not listed above, please refer to your browser's documentation or online guide for more information.

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