

COOKIE POLICY

This page provides information on the use of cookies as well as other tracking tools (the "Information Notice") installed on the site www.waysadvisory.it (the "Website") and necessary for the provision of services provided by the Data Controller, as defined below, also through the Website.

The Information Notice is provided in accordance with the provisions of (i) Article 13 of European Regulation no. 679/2016 on the protection of personal data ("GDPR"); (ii) Directive 2002/58/EC, also known as the "e-privacy directive", as well as (iii) the resolution issued on 8 May 2014 by the Italian Data Protection Authority, the "Garante per la Protezione dei Dati Personali" containing the rules on "Determination of simplified arrangements for information notices and obtaining consent for the use of cookies", as supplemented by the "Guidelines on the use of cookies and other tracking tools - 10 June 2021".

The Website uses different types of cookies, as further specified below.

The storage of information in your terminal equipment (browser or mobile device) or access to information already stored by means of cookies is only permitted on condition that you have given your consent after having been informed by means of the simplified policy (so-called "banner") and acquisition of consent for the use of cookies, in accordance with the provisions of the Supervisory Authority.

This Information Notice, therefore, is intended to provide you with all the information you need to understand (i) what cookies are, (ii) what cookies are used by the Website, (iii) what are the procedures for enabling or disabling cookies.

For further information on the other processing of personal data processed through the Website, please refer to the Website's Privacy Policy accessible at the following link:

[informativa-sito-ways-advisory carta intestata def ing.pdf \(waysadvisory.it\)](#)

1. Data Controller's contact details

The Data Controller of the processing is Ways Advisory S.p.A., VAT no.: 12646650965, with registered office in Milan, Corso Italia 13, 20122, Milan, tel. 0289760689, e-mail address info@waysadvisory.it (the "Controller").

2. What are cookies?

2.1 Cookies are small text files that websites visited by users send to their terminals, where they are stored in order to be retransmitted to the same sites on subsequent visits and are generally used for different purposes: performing computer authentication, session monitoring, storing information on specific user configurations, storing preferences, etc.

2.2 Based on the website or domain that installs the cookies, they can be distinguished into:

- a) owner cookies: installed on the user's terminal directly by the owner or operator of the website that the User is visiting;
- b) third-party cookies: installed through the site the User is visiting by holders of different sites or web servers.

2.3 Based on how long cookies are valid, they can be subdivided into:

- a) session cookies: these are stored temporarily in the user's terminal until the end of the browser session. These cookies are usually necessary for the proper functioning of the applications and functionalities of the site;

- b) persistent cookies: these remain stored on the user's terminal equipment for a longer period of time than the individual browsing session, depending on their function and the user's choices regarding them. Persistent cookies allow information to be transferred back to the web server each time the website is accessed.

2.4 Based on the purposes pursued, cookies can be included into two general categories:

- a) "technical" cookies, which, being strictly necessary to provide a service requested by the user, do not require the user's consent, and in the absence of which certain operations could not be carried out or would be more complex and/or less safe; for this reason they are automatically installed following access to the website; they include (i) browsing cookies that ensure normal surfing and use of the website (allowing, for example, to make a purchase or to authenticate to access restricted areas), (ii) functionality cookies (which allow the user to navigate according to a set of selected criteria such as language);
- b) "profiling" cookies, used to refer specific actions or behavioral patterns recurring in the use of the offered functionalities (pattern) to specific identified or identifiable subjects, in order to group the different profiles within homogeneous clusters of different sizes, so that the holder can, among other things, also modulate the provision of the service in an increasingly customized manner beyond what is strictly necessary for the provision of the service, as well as send targeted advertising messages, i.e. in line with the preferences expressed by the user while surfing the web; this category also includes c. so-called "social cookies", i.e. cookies from social networks, used in accordance with the policies of the relevant social network, as well as so-called. "analytical cookies" - which are used to analyses access and visits to the site itself and to allow the owner to improve its structure, navigation logic and contents, to assess the effectiveness of a service provided or to help measure "traffic", i.e. the number of visitors, also possibly broken down by geographical area, time slot of the connection or other characteristics - unless they can be assimilated to technical cookies, which is possible only where (i) the use of analytical cookies is limited solely to the production of aggregate statistics and that they are used in relation to a single site or a single mobile application in such a way as not to allow the tracking of the navigation of the person using different applications or browsing different websites (ii) they are implemented and used directly by the first party site or, if of third party, appropriate means are adopted to reduce the power of identification (by masking significant portions of the IP address), and (iii) contractual obligations are in place between the sites and third parties which expressly mention the third party's commitment to use them exclusively for the provision of the service, to store them separately and not to "enrich" them or "cross-reference" them with other information they possess, or to transmit them to other third parties. As they are not strictly necessary for the functioning of the website, profiling cookies require the users' consent for their installation.

3. Cookies used on the Controller's Site.

3.1 The Website uses the following technical cookies which, being strictly necessary, cannot be disabled *via* the "manage options" tool. For each of the technical cookies listed, in addition to their specific function, the period of validity of the cookies and the source are indicated:

COOKIE NAME	SOURCE	FUNCTION	DURATION
wp-wpml_current_language	WPML	Cookie essential for registering the choice of language	Session duration
_cookie_privacy_accepted	Owner	Record your cookie acceptance preferences.	182 days

3.2 The Website also uses the following profiling cookies, namely, third-party 'analytical cookies'.

The Controller has no control over the process used by third party sites to collect information on navigation on the Site, linked to the personal data they hold. We therefore invite you to consult the privacy policies of the third parties, whose links are indicated in the table below, to find out the purposes of use, including advertising, of the information they may collect. These policies should also enable you to exercise your consent choices with these third parties through the means made available by them.

For each of the cookies listed in the table below, in addition to their specific function, the period of validity of the cookies and the respective proprietary or third-party source is indicated; there is also a link to the privacy policy and consent form of the respective third-party website where you can make any choices in this regard.

Analytical cookies:

COOKIE NAME	SOURCE	FUNCTION	DURATION	DISCLOSURES AND CONSENTS
ga*	Third-party: Google Analytics	Analytics: used to maintain session status, archive and count page views	1 year	https://policies.google.com/privacy?hl=it

4. Acceptance of the use of cookies

4.1 When first accessing any page of the Website, there is a banner containing a short information notice containing a link to this Information Notice, the "Accept" button to be clicked if the User wishes to give consent to the installation of all cookies other than technical cookies, as well as the "Manage Cookies" button that allows the user, through a special tool, to accept (or, subsequently, deny) consent, to all or also separately, by moving the relevant sliders - to the various functionalities, third parties and categories of non-technical cookies. However, it is not possible to disable technical cookies as they are strictly necessary for the functioning of the site. In the top right-hand corner of the banner there will also be a command marked with a cross, the selection of which will result in the default settings remaining in place so that no non-technical cookies are installed, and therefore the continuation of browsing in the absence of cookies other than technical ones.

4.2 Closing the banner by clicking on the cross at the top right of the banner, scrolling down the page or clicking anywhere on the page of the Site outside the banner itself does not amount to consent to the use of cookies other than technical cookies

4.3 The user may at any time access the "Manage Cookies" tool to revoke/change the consent given by clicking on the button in the footer of any page on the site.

4.4 The Controller uses a technical cookie to store user preferences related to cookies.

4.5 Through the options provided by your browser you can always set your browser so that cookies are stored on your device or can be rejected, e.g. by default or by their owners. Each browser has a different way of enabling cookie management and choices, as described on the information pages of each browser. You can disable cookies by following the instructions provided by the main browsers at the following links:

- Google Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=it>

- Apple Safari: <https://support.apple.com/it-it/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

- Mozilla Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>

- Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>

- Microsoft Edge: <https://support.microsoft.com/it-it/microsoft-edge/eliminare-i-cookie-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

- Microsoft Internet Explorer: <https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>

Please note that if you decide to disable even technical cookies via the functions provided directly by your browser, you may lose many of the functionalities of the website and some services may not work, as they should.

4.6 Further information is available at <http://www.youronlinechoices.com/it/le-tue-scelte/>, which brings together digital advertising professionals in the European Digital Advertising Alliance (EDAA). The member companies on this platform allow the user to reject or accept through it the cookies they use to adapt the ads that may be displayed on their device to information about their browsing behaviour.

5. Purpose and legal basis of personal data processing

5.1 The data collected through technical cookies will be processed for the purposes described above in point 2.4 lett. a) with the functionalities described in the table in section 3.1, therefore exclusively to allow the user to correctly use all the functionalities of the Site and the requested services; therefore, on the legal basis of the execution of a pre-contractual request or contractual execution.

5.2 Data from profiling cookies are used for the purposes described above under point 2.4 letter b) with the functionalities described in the tables under point 3.2, only in the presence of the user's consent, which constitutes the legal basis for the relevant processing.

6. Limitations of liability

The Data Controller declines all responsibility for the content, completeness and truthfulness of information and documents held by third parties, even if they are contained and/or published on the Website through links to third-party websites.

7. Amendments to this Information Policy

It may sometimes be necessary to make changes to this Information Notice because of changes in legislation or to keep up with new technological developments. The Data Controller reserves the right to make such changes at any time, which will be duly communicated to the user.

The page containing the Information Notice is visible, by means of a link at the bottom of all pages of the Site pursuant to Article 122 second paragraph of Legislative Decree NO 196/2003, as amended by Legislative Decree No 110/2018 and following the simplified modalities for the provision of information and acquisition of consent for the use of cookies published in the Official Gazette No. 163 of 9 July 2021) and its register of measures No. 231 of 10 July 2021.

Last update: March 2023