



COOKIE NOTICE

Pursuant to current legislation on the protection of personal data (“**Privacy Legislation**”), including Regulation (EU) 2016/679 (“**GDPR**”), Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 (the “**Privacy Code**”) and the orders of the Italian Data Protection Authority (the “**Privacy Authority**”), Reno De Medici S.p.A., as data controller (the “**Company**”, “**Reno De Medici**” or the “**Controller**”) provides users (hereinafter the “**Users**” or, in the singular, the “**User**”) with the following information on the cookies installed on the domain www.rdmgroup.com (the “**Website**”) and its sub-domains accessible via the Website.

What cookies are

Cookies are text files and numbers that are installed during navigation on a website, in the memory of the *device* (*pc, smartphone or tablet*) connected to the Internet through the *browser* application installed therein. Cookies, usually present in Users' *browsers* in very large numbers and sometimes also with very long-term characteristics, are used for different purposes such as, but not limited to, performing computer authentication, monitoring sessions, storing information on specific configurations regarding Users accessing the *server*, etc.

From the time point of view, cookies can be stored permanently on the User's device (so-called “**persistent cookies**”), until the agreed expiry date (minutes, days, years), or they can be deleted automatically when the *browser* is closed (so-called “**session cookies**”).

Cookies may also be installed by the Website visited by the User (so-called “**first party cookies**”), or may be installed by other websites (so-called “**third party cookies**”).

In addition, the Privacy Legislation identifies the following macro-categories:

- (i) “**technical cookies**” are cookies that are used to browse or provide a service requested by the User. These cookies are not used for other purposes and are normally installed directly by the owner or manager of the Website. These cookies can also be divided into:
 - navigation or session cookies, which guarantee normal navigation and use of the website (allowing, for example, to make a purchase or authenticate yourself to access reserved areas);
 - functionality cookies, which allow the User to navigate according to a number of selected criteria (for example, language, products selected for purchase) in order to improve the service provided to the User.

The Users' prior consent is not required for the installation of technical cookies;

- (ii) “**cookie analytics**” are used to monitor the use of the Website by Users for the purposes of optimising the Website (number of visitors, pages visited, time spent on the Website, etc.).

In order for *analytics* to be equated with technicians, it is essential to prevent the possibility of obtaining, through their use, direct identification of the interested party, which is equivalent to preventing the use of *analytics* cookies that, due to their characteristics, may be direct and unambiguous identifiers.

In particular, in order to treat *analytics* cookies as technical cookies, it is necessary that: (i) *analytics* cookies are used solely to produce aggregate statistics and in relation to a single site or mobile application so as not to allow tracking of the navigation of the person using different



applications or surfing on different websites; (ii) for third party *analytics* cookies, at least the fourth component of the IP address is masked; (iii) third parties refrain from combining such *analytics* cookies with other processing (customer files or statistics on visits to other sites, for example) or from transmitting them to third parties.

For the installation of such *analytics* cookies, similar to technical cookies, the Users' prior consent is not required; where, on the other hand, *analytics* cookies are not similar to technical cookies, the Users' consent to their installation will be required;

- (iii) "**profiling cookies**" are cookies aimed at creating profiles related to the User and are used to send advertising messages in line with the preferences expressed by the User during web browsing. Due to the particular invasiveness that such devices may have within the privacy sphere of Users, the Privacy Legislation provides that the User must be adequately informed about the use of such devices and thus express his/her valid consent.

The User's consent is therefore necessary for the installation of profiling cookies, after the User has been informed in a simplified manner.

Types of cookies used by the Website and their purposes

When the User connects to the Site, the following cookies may be installed on the User's device:

- **Technical cookies**

These cookies are necessary for the operation of the Website and cannot be deactivated in Company systems. They are usually only set in response to actions made by the User that constitute a service request, such as setting privacy preferences, accessing or filling out forms. You can set your *browser* to block or have alerts about these cookies, but as a result some parts of the Website will not work. These cookies do not store personal information.

Technical cookies					
Domain	Cookies	Cookies used	Purpose	Duration cookies	How to deselect cookies
.rdmgroup.com	OptanonConsent	Third Party	allow normal navigation of a site or to provide a service requested by the User	A few seconds	To be removed and blocked using the settings of the <i>browser</i> (described in more detail below).



Technical cookies					
Domain	Cookies	Cookies used	Purpose	Duration cookies	How to deselect cookies
.rdmgroup.com	OptanonAlertBoxClosed	Third Party	allow normal navigation of a site or to provide a service requested by Utent	1 year	To be removed and blocked using the settings of the <i>browser</i> (described in more detail below).

It should be noted that:

- (i) first-party cookies are the direct and exclusive responsibility of the Data Controller;
- (ii) **third-party cookies fall under the direct and exclusive responsibility of the third party itself.** It also follows that third party cookie providers are required to comply with the Privacy Legislation. For this reason, we refer to the links of the web pages of the third party website, where the User can find the forms for obtaining consent to cookies and their related information.
 - <https://policies.google.com/technologies/cookies>

It should also be noted that the Website does **not** use cookies *analytics* and profiling cookies

Management of cookie preferences

How can the User manage and/or deactivate cookies?

When the User first visits the Website, he/she is informed of the type of cookies used by the Website through an immediate informative *banner* at the top of the Website. In the same *banner*, the User can manage his/her preferences for the installation of cookies through special commands. Following the display of the *banner*, by continuing to browse the Website, the User accepts the use of selected cookies by the Website.

However, you can change your cookie settings by going through the “*How to deselect cookies*” section of the tables above. Disabling cookies may compromise your use and operation of the Website.

How can you manage your cookie preferences through your *browser*?

Each *browser* allows you to limit and delete cookies. You may manage cookie preferences directly in your *browser* and prevent – for example – third parties from installing them.



Below are ways to disable cookies directly by acting on the configuration settings of the main *browser* applications:

- **Internet Explorer**

1. Open Internet Explorer;
2. Click on the “Tools” button and then on “Internet Options”;
3. Select the “Privacy” tab and, in “Settings”, select “Advanced”, then choose whether to accept, block or receive a request for first-party or third-party cookies.

- **Microsoft Edge**

1. Open Microsoft Edge;
2. Select “Settings and more” in the top right corner of the browser window;
3. Select “Settings”, then select “Privacy, search and services”;
4. Select “Choose items to delete” in “Delete Explorer Data” and then “Delete Explorer Data now”;
5. Select a time range in Time Range;
6. Select “Cookies and other site data”, then “Delete now”.

- **Google Chrome**

1. Open Google Chrome;
2. Click on the “Tools” icon;
3. Select “Settings” and, in the “Privacy and security” section, click on “Cookies and other website data”;
4. In the open tab, you can select an option (i.e. accept all cookies, block all cookies, block third-party cookies in incognito browsing mode, block third-party cookies) and save preferences.

- **Firefox**

1. Open Firefox;
2. Press the “Alt” button on the keyboard;
3. In the toolbar located at the top of the browser, select “Tools” and then “Settings”;
4. Then select the “Privacy and security” tab;
5. In the “Advanced anti-theft protection” section, select the “Custom” option and then mark the “Cookies” box;
6. Use the drop-down menu to select the types of cookies to be blocked (i.e. cookies from websites not visited, all third party cookies or all cookies);
7. Close the “about:preferences#privacy” page, any changes you make will be saved automatically.

- **Opera**

1. Open Opera;



2. Click on "Settings" in the browser menu and select "Go to full settings";
3. Select the item "Confidentiality and Security" and then click on "Cookies and other site data";
4. Select your preferences (i.e. accept all cookies, block third party cookies in private mode, block third party cookies, block all cookies), changes made will be saved automatically.

- **Safari**

1. Open Safari;
2. Choose "Preferences" in the toolbar, then select the "Privacy" panel in the dialog box below.
3. In the "Accept cookies" section it is possible to specify if and when Safari should save cookies from websites. Click the "Help" button (marked with a question mark) for more information;
4. For more information about cookies stored on your computer, click on "Show cookies".

After these operations, however, certain features of the Website's web pages may not be performed properly.

Communication and dissemination of data

Data collected using cookies may be processed by our employees and contractors as authorised persons pursuant to the Privacy Legislation.

Such data may also be processed by companies of our confidence that carry out technical and organisational tasks on behalf of RDM. These companies are our direct collaborators and operate under a notice of appointment as data processors.

The list of all appointed data processors involved in processing operations through the Website is constantly updated and available on request by sending a communication to the email address RDM-GDPR@rdmgroup.com.

Personal data collected using cookies will not be assigned to third parties and will only be processed within the European Union. Where there is a need to transfer data outside the European Union, RDM will take care to make such transfers only where there are adequate safeguards pursuant to Article 46 et seq. of the GDPR.

Data collected using third party cookies may be transferred by such third parties outside the European Union. In any case, falling under the direct and exclusive responsibility of third parties, please visit the relevant cookie policies at the link indicated in the cookie policy table.

Data collected using cookies will not be disseminated.

Your Rights

Users are always entitled to access their personal data, to request that it be rectified or updated if it is incomplete, erroneous or collected in breach of the law, that it be deleted and to withdraw their consent at any time or to oppose or limit its processing for legitimate reasons.



Unless processing is necessary, Users are also entitled to receive (or transmit directly to another controller) personal data concerning them in a structured, commonly used and machine-readable format and to request the deletion and/or destruction of the data.

In the above cases, where necessary, the Data Controller will bring to the attention of third parties to whom the User's personal data are communicated of any exercise of rights, with the exception of specific cases where this is not possible or is too costly and, in any event, in accordance with the Privacy Legislation.

Where processing is based on consent, the data subject shall also be entitled to withdraw any consent given at any time, it being understood that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

In order to exercise their rights, Users may send RDM a registered letter.R to the address indicated below or an email to RDM-GDPR@rdmgroup.com and to the DPO at: dataprotectionofficer@rdmgroup.com .

The Data Controller informs the User that, pursuant to the Privacy Legislation, he/she has the right to lodge a complaint with the competent Supervisory Authority (in particular in the Member State of his/her habitual residence, place of work or place of the alleged breach), if he/she is of the opinion that his/her personal data are processed in such a way as to lead to breaches of the GDPR.

In order to facilitate the exercise of the right to lodge a complaint, the name and contact details of the EU Supervisory Authorities are available at the following link: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

If the User intends to lodge a complaint with the Italian Supervisory Authority (i.e. The Guarantor), the complaint template is available at the following link: <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>.

Data Controller, Data Processor and Data Protection Officer

The Data Controller is Reno De Medici S.p.A., with registered office at Viale Isonzo 25, Milan, VAT and TaxF. 00883670150.

RDM's Data Protection Officer is domiciled for the purpose at our headquarters and can be contacted at the following email address: dataprotectionofficer@rdmgroup.com.

Referral

For further information, please refer to the Privacy Policy of this Website.

Last updated: 30 September 2022