

Cookie Policy

1 Foreword

When you browse our website or use our services, we collect information and personal data about you. For this reason, in accordance with the provisions of Legislative Decree no. 196/2003 and EU Regulation no. 679/2016 (together, the "Privacy Policy"), we have created this document (hereinafter, the "Cookie Policy") in order to describe to you what personal data we collect, the purposes and methods of processing them and the security measures we take to protect them.

This Cookie Policy constitutes the information to data subjects residing in the European Union issued pursuant to the applicable data protection legislation and has been drafted in accordance with Recommendation No. 2/2001, adopted on 17 May 2001 by the Working Party on the Protection of Personal Data - Article 29 in relation to the minimum requirements for online data collection in the European Union. It is issued by **Softlab GBR Ltd** with registered office at 20 Fitzroy Square, London, W1T 6EJ, England, UK, the data controller of your browsing data.

If you are not a resident of an EU country, please check the User Privacy Policy posted on the site at: softlabgbr.uk

This Cookie Policy applies only to the website [https:// softlabgbr.uk](https://softlabgbr.uk) (hereinafter, the "Site") and our services (hereinafter, the "Services") and does not apply to any third party websites that may be referred to via links or banners within the Site.

2 Data source and purpose of data processing

Navigation data

The computer systems responsible for the operation of the Services acquire, in the course of their normal operation, some of your personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected for the purpose of identifying you, but could lead to your identification if, for example, it were combined with data held by third parties. This category of data includes the IP address and the domain name of your computer, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server and other parameters relating to your operating system. We use this data for the sole purpose of obtaining anonymous statistical information on the use of the Services and to check that they are working properly. We delete data collected in this way immediately after processing or aggregate and anonymise it for statistical purposes. The data could be used to ascertain liability in the event of computer crimes committed against the Company.

Registration and further information

Browsing our Site does not require the creation of a personal account.

Purpose of processing

Providing us with the above navigation data is necessary in order to use the Site. Any refusal to provide them would prevent your navigation on our Site and prevent you from using our Services.

Providing further information is optional. Your refusal to provide it would still allow you to use our Services but would prevent you from discovering and exploring their full potential.

Further processing purposes

With your express consent, we will also use the information you provide for purposes other than those listed above. These include processing for marketing purposes through the creation of a personal account for access to pages reserved for registered users.

Providing information for the above additional purposes is optional. Your refusal to provide it would still allow you to use our Services but would prevent us from pursuing the purposes listed above. In any case, you

can always withdraw your consent to the collection and processing of your personal data and object to receiving promotional communications.

Information collected through cookies and other technologies

Cookies are small files sent by websites visited by users and stored on the device used to access those sites. When users visit the same site again, the browser reads the cookies stored on the device and transmits the information back to the site that originally created the cookies. Our Site also uses various types of cookies and other technologies to read and store information on your device in order to, for example, perform statistical analysis, personalise and facilitate your browsing experience and, with your consent, offer you interest-based advertising. We do not use cookies that have the ability to launch programs on your devices or to send viruses to your devices.

In accordance with the provisions of the order of 8 May 2014 of the Guarantor for the protection of personal data, we inform you that this information notice is also an extension of the short banner already displayed when connecting to the Site. In particular, our Services adopt:

technical cookies, which are necessary for the operation of the Site, including the provision of the Services offered by the Site. This category of cookies includes analytics, session and functionality cookies, which are used by the owner to, for example, collect information, in aggregate form, on the number of users and how they visit the site, to save your browsing preferences, such as language, or to recognise users returning to the site.

The above-mentioned cookies may be:

1. temporary, when they are automatically deleted at the end of the connection;
2. permanent, when they remain stored on the user's hard disk, unless the user himself deletes them;

The cookies used are exclusively first-party cookies, as they are set and managed directly by the Site operator. No third-party cookies are used on the Site.

The Site does not use profiling cookies.

You can manage and deactivate cookies directly from your browser settings:

Internet Explorer

Google Chrome

Safari

Firefox

Below is the table with the cookies used by our Services.

Name	Supplier	Purpose	Deadline	Type
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<p>__utm.gif</p>	<p>google-analytics.com</p>	<p>This cookie is used to determine which type of device or browser the visitor is using; this allows the formatting of the site to be changed accordingly</p>	<p>Session</p>	<p>Pixel Tracker</p>
<p>__utma</p>	<p>softlabgbr.uk</p>	<p>It collects data on the number of times a user has visited the website, as well as data for the first visit and the most recent visit. Used by Google Analytics.</p>	<p>2 years</p>	<p>HTTP Cookies</p>
<p>__utmb</p>	<p>softlabgbr.uk</p>	<p>Records a timestamp with the exact time of access to the site by the user. Used by Google Analytics to calculate the duration of a visit to the site.</p>	<p>1 day</p>	<p>HTTP Cookies</p>

__utmc	softlabgbr.uk	Records a timestamp with the exact time the user exits the site. Used by Google Analytics to calculate the duration of a visit to the site.	Session	HTTP Cookies
__utmt	softlabgbr.uk	Used to limit the speed of requests to the site.	1 day	HTTP Cookies
__utmz	softlabgbr.uk	Collects data on where the user came from, the search engine used, the link clicked and the search term used. Used by Google Analytics.	6 months	HTTP Cookies

We also share aggregate information about how our Site is used with our web analytics and social media technology partners, who may combine it with other information they have collected from the use of their services.

The necessary cookies make the Website usable by enabling basic functions such as page navigation and access to protected areas. The Website cannot function properly without these cookies.

The Services may contain applications and materials ("APIs") that use data from your open accounts on social networks such as Facebook, LinkedIn, etc. For example, an API may be created that allows you to post

comments directly on the social network you are a member of. When you use such an API, your personal data is transmitted to the social network site. This data is governed by the privacy policy of that social network. An API may also be created to obtain information and content about you, your friends, your user ID and other types of content from the social network you use. Such information and content will not be acquired unless you have given your consent on the Social Network Site. Where such consent is given, such information will be used in accordance with this Cookie Policy and the API rules of that social network.

3 Methods of data processing and storage

We process your personal data with the help of electronic means and always in compliance with the security requirements of the applicable legislation. Our security measures include contractual means with any contractor (e.g. service providers) or agent in order to ensure the protection of the security and confidentiality of your personal data in accordance with the provisions of applicable data protection legislation.

We retain your personal data to the extent necessary to comply with obligations imposed by law or regulation, to protect our rights, to prevent fraud or to enforce this Cookie Policy.

4 Scope of Communication

Internal and external communication of personal data

Your personal data will be processed only by persons previously authorised to process them or by data processors. In particular, your data may be disclosed to external parties such as professional and/or technical service providers, and/or legitimate recipients in accordance with the law and, subject to your consent as specified above, to third party companies carrying out marketing activities. The recipients of the data act as data controllers, data processors or data processors in accordance with applicable law. Should we be involved in a reorganisation, acquisition or sale of our company or parts of it, we will disclose your data to the third parties involved in the procedure.

Any third party who is a recipient of your data in the course of this procedure may use it within the limits set by this Cookie Policy. To receive the updated list of data processors, as well as the list of recipients of your personal data, please contact us by sending an email to the following address: compliance.operations@soft.it

Transfer of data abroad

Your personal data may be transferred by us outside Italy to third party recipients established within the European Union. This transfer is free of charge as each country of the European Union guarantees an adequate level of data protection. Insofar as we decide to transfer your data to third countries outside the European Union, which do not guarantee the same level of data protection, we inform you that such a transfer to third countries will always take place in accordance with the provisions of the Privacy Policy, i.e. by collecting your consent, when necessary, or by adopting any other measures necessary to guarantee the security of the data being transferred (e.g. the use of Standard Contractual Clauses based on the model elaborated by the European Commission).

5 Rights of the data subject.

You may exercise your rights under the Privacy Policy at any time, as follows:

Request for access to your personal data: you have the right to obtain from the data controller confirmation as to whether or not personal data concerning you are being processed and, if so, access. Access involves knowing certain information, including the purposes of the processing, the categories of personal data processed and the recipients to whom the data are disclosed. However, there is no right of access that can be exercised absolutely, and the interest of others may limit your right of access. You also have the right to obtain a copy of the personal data being processed. A fee may be charged for additional copies.

Rectification of your personal data: you have the right to obtain the rectification of inaccurate personal data concerning you, as well as to obtain the integration of incomplete personal data, including by providing a supplementary declaration.

Deletion of your personal data: you have the right to obtain from the controller the deletion of personal data concerning you without undue delay, and the controller is obliged to delete your personal data without undue delay if certain circumstances exist, including the fact that the data are no longer necessary for the purposes for which they were collected or that your consent has been withdrawn.

Limitation of the processing of your personal data: in limited circumstances - including if the accuracy of the data is contested - you have the right to request the limitation of the processing of personal data concerning you.

Data portability: you have the right to receive in a structured, commonly used and machine-readable format personal data concerning you that you have provided to a data controller and you have the right to transmit those data to another data controller without hindrance from the controller to whom you have provided them where the processing was based on consent and is carried out by automated means.

Objection to processing: you have the right to object to the processing of personal data concerning you at any time, on grounds relating to your particular situation.

The right to lodge a complaint with the competent supervisory authority (the Data Protection Authority) remains unaffected.

To exercise these rights, please contact us using the contact details below.

6 Data Controller and Processor.

The Site and Services are managed by Softlab Holding S.r.l., with registered office in Milan, viale Zara 58, which acts as data controller.

The Data Controller, established outside the European Union, has appointed as its **Representative in the European Union, pursuant to** art. 27 of the Regulation, Softlab S.p.a. who can be contacted by e-mail at: compliance.operations@soft.it.