

## Cookie Policy

Privacy Notice under article 13 of General Data Protection Regulation EU 2016/679 (GDPR)

The following privacy notice is an extension of the information on the use of cookies and other tracking tools provided to you through the minimal information notice included in the banner shown on first accessing any website's page.

This page is addressed to users that are browsing the following website: brama-group.com ("**Website**")

The Data Controller is Brama Srl with registered office in Via dei Torrazzi, 41, 41122 Modena, Italy ("**Data Controller**" or "**Company**"),

### 1. Definitions, characteristics, and application of the legislation

Cookies are small text files that may be sent to and registered on your computer or mobile device by the websites you visit, to then be re-sent to those same sites when you visit them again

It is thanks to these cookies that those websites can "remember" your actions and preferences (e.g., login data, language, font size, other display settings, etc.), so that you do not need to configure them again when you next visit the website, or when you change pages within a website. Cookies are, therefore, used for electronic authentication, monitoring of sessions and storage of information regarding your activities when accessing a website. They may also contain a unique ID code which allows tracking of your browsing activities within a website, for statistical or advertising purposes.

#### *Categorization of cookies*

When browsing a website, besides cookies directly placed by the visited website (i.e., "**first party cookies**"), you may also receive on your device cookies from websites or web servers other than the website being visited (i.e., "**third-party cookies**").

Some operations within a website may not be able to be performed without the use of cookies which, in certain cases, are technically necessary for operation of the website.

There are various types of cookies, depending on their characteristics and functions, which may be stored on your computer or mobile device for different periods of time: "**session cookies**" or "**browsing cookies**", which are automatically deleted when you close your browser, and "**permanent cookies**", which will remain on your device until their pre-set expiration period passes.

There are also "**analytics cookies**", used to assess the effectiveness of an information society service provided in order to design a website or to help measure its "traffic" - i.e., the number of visitors, possibly broken down by geographical area, connection time slot or other characteristics.

According to the law which may be applicable to you, your consent may not always be necessary for cookies to be used through the Website. In particular, "**technical cookies**" – i.e., cookies used exclusively to transmit messages over an electronic communications network, or otherwise strictly necessary to provide a service specifically requested by you – typically do not require this consent. In other words, these are cookies which are indispensable for operation of the Website or required to perform activities you request and without them some operations could not be performed or could be more complex and/or less secure.

Among technical cookies, for which use is not required a consent, the Italian supervisory authority "Garante per la protezione dei dati personali" (see *Guidelines on the use of cookies and other tracking tools – 10 June 2021* and subsequent clarifications, hereinafter "**Guidelines**") encompasses also:

- analytics cookies when, through their use, the possibility to directly identify the data subject (i.e., “**single out**”) is prevented, therefore blocking the use of analytics cookies that could result in direct and unique identifiers. Furthermore, the structure of such cookies must encompass the possibility to refer not to one device, but to multiple devices, in order to create a reasonable uncertainty on the IT identity of the cookie recipient (usually this is done by masking out appropriate portions of IP address in the cookie as indicated in the Guidelines). Finally, to be identified as technical, analytics cookies must be limited to the sole production of aggregate statistics and must be used in relation to a single website/mobile application in order to prevent the tracking of the person who use different application or browse different websites.
- session cookies or browsing cookies
- Function cookies, which allows you to browse accordingly some selected criteria (e.g., language, products picked for purchase), in order to improve your experience.

Otherwise, for “**profiling cookies**”, aimed to create users’ profile and used to customize the service beyond what is strictly necessary for its provision, to send targeted advertisements in line with the preferences expressed by the user in the context of his/her web browsing and/or to analyze and monitor the user behaviour, a prior consent is required.

## 2. Types of cookies used by the Website

The Data Controller has classified cookies by type of use, as follows.

Given that there is the obligation to respect the applicable law even for the third parties that provide cookies, please refer to the link that Data Controller provide to the web pages of third party suppliers in which you can find consent forms and their related privacy notices.

### TECHNICAL COOKIES

#### i) SESSION COOKIES OR BROWSING COOKIES

Cookies allowing the normal use of the website and of its services, like statistical analysis. This type of cookies can also be distinguished by the presence on the user’s device. Cookies that are automatically deleted after every browsing session are called “session cookies”, otherwise cookies that last longer are called “permanent cookies”.

This type of cookies are necessary for the proper operation of the website and so the prior consent of the user for the installation is not needed.

Here’s a list of such cookies:

Name	Domain/Supplier	Type	Purpose	Duration	Link to third party website
_gat	.brama-group.com	Performance	This cookie is installed by Google Universal Analytics to throttle the request rate to limit the collection of data on high-traffic sites.	1 minute	

#### ii) COOKIE ANALYTICS

This type of cookies collect, anonymously, information on how the Website is used and allow the Data Controller to have a better knowledge of the users and to improve the operation of the Website itself. Analytics cookies are considered as technical cookies if it is not possible to directly identify the data subject and not result direct and unique identifiers. Furthermore, the structure of such cookies must encompass the possibility to refer not to one device, but to multiple devices, in order to create a reasonable uncertainty on the IT identity of the cookie recipient. Finally, this type of cookies are limited to the sole production of

aggregate statistics and used in relation to a single website/mobile application in order to prevent the tracking of the person who use different application or browse different websites. To install this type of cookies the prior consent of the user is not required.

Here's a list of such cookies:

Name	Domain/Supplier	Type	Purpose	Duration	Link to third party website
_ga	.brama-group.com	Analytics	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.	2 years	
_gid	.brama-group.com	Analytics	This cookie is installed by Google Analytics. The cookie is used to store information on how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected includes the number of visitors, the source where they have come, and the pages visited in an anonymous form.	1 day	

### 3. Social Plug-in

“Social buttons” are displayed on the Website to allow you to share contents on social network sites like Facebook, Instagram, Twitter, LinkedIn. Cookies are placed by these platforms on the Website, to allow them to collect information on your browsing.

For more information on cookie management and privacy notices of: Facebook [click here](#), Instagram [click here](#), Twitter [click here](#), LinkedIn [click here](#), YouTube [click here](#).

### 4. Web beacon

Web beacon are tiny invisible images that the Company uses in newsletters. Such images allow to identify statistical information on the use of the newsletter and allow the Company to improve this service. To prevent this statistical information to be collected is necessary to set the HTML deactivation in the e-mail system so that Company's newsletter can be read as text. Furthermore, all the newsletters sent by the Company contain a link to unsubscribe.

### 5. Your decisions on cookies

You can select a function for which your device will warn you every time a cookie is installed, otherwise you can decide to deactivate all cookies. You can select these functions through the web browser settings. Every browser is slightly different, we invite you to identify the right way to set the functions related to cookies by checking the browser menu. If you decide to deactivate cookies, you shall not access many function that make you experience on the Website more efficient and some of the service of the Company shall not operate correctly.

#### a) Instructions for cookie management

If you have a different type or version of browser, please refer to the relevant menu.

#### Microsoft Edge

For instructions on how to clear cookies on Edge, [click here](#)

### *Google Chrome*

For instructions on how to clear cookies on Chrome, [click here](#)

### *Mozilla Firefox*

For instructions on how to clear cookies on Firefox, [click here](#)

### *Safari*

For instructions on how to clear cookies on Safari, [click here](#)

### *Opera*

For instructions on how to clear cookies on Opera, [click here](#)

#### *b) Your preferences expressed online via inter-professional websites*

Vi invitiamo ad accedere al sito Youronlinechoices proposto dalle società di pubblicità digitale professionali

The Company invites you to visit Youronlinechoices website, proposed by professional digital advertisement companies grouped within EDAA (European Digital Advertising Alliance) and managed in Italy by Interactive Advertising Bureau Italia (<http://www.iab.it/>). You will be able to know the companies registered to this platform offering the possibility to refuse or accept cookies used by them to adapt advertising likely to be displayed on your device to you browsing information: <http://www.youronlinechoices.com/it/>.

## 6. Recipients of personal data

Your Personal Data may be shared, for the purposes listed above, with:

- Persons authorised by the Company to process Personal Data needed to carry out activities strictly related to the provision of the Services, who have undertaken an obligation of confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., employees and system administrators).
- Third parties engaged in order to manage the Website, acting as data processors on the Company's behalf (For the complete and updated list of the categories of data processors, please write to: [gdpr@brama-group.com](mailto:gdpr@brama-group.com)).
- Public entities, bodies, or authorities to whom your Personal Data may be disclosed, in accordance with the applicable law or binding orders of those entities, bodies or authorities.

## 7. Transfers of personal data

Some of your Personal Data are shared with Recipients who may be located outside the European Economic Area. The Company ensures that your Personal Data are processed by these Recipients in accordance with the Regulation. Under the Regulation, these transfers can be based on an adequacy decision, on the Standard Contractual Clauses approved by the European Commission or on another appropriate legal basis.

## 8. Data subject rights

Under Articles 15 and following of the Regulation, you, as a data subject, are entitled to request from the Company, at any time, access to your Personal Data, the rectification and erasure of your Personal Data, as well as to object to its processing. You are also entitled to request the restriction of the processing of your

Personal Data in the cases set out in Article 18 of the Regulation, as well as to obtain the Personal Data you have provided to the Company in a structured, commonly used and machine-readable format, in the cases set out in Article 20 of the Regulation.

At any time, under Article 7 of the Regulation, you may withdraw the consent already provided, without prejudice to the lawfulness of the processing carried out prior to the withdrawal of such consent.

Requests should be made in writing to the Data Controller at: [gdpr@brama-group.com](mailto:gdpr@brama-group.com)

In any case, please note that, as a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of Personal Data (article 77 of the Regulation), if you believe that the processing of your Personal Data carried out through this Website violates applicable law.