

## PRIVACY & COOKIES POLICY

This document is intended to describe the privacy policy of our website [www.react4life.com](http://www.react4life.com), with reference to the processing of personal and non-personal data of users/visitors who consult it.

The company React4life, with registered office in Genoa, Via Fiasella, 1/11 – CAP 16121; P.I. 02436280990; e-mail: [privacy@react4life.com](mailto:privacy@react4life.com), PEC: [react4life@pec.it](mailto:react4life@pec.it); phone: 010-8599011, as the owner of personal data processing, guarantees compliance with the legislation on personal data protection (Reg. 2016/679/EU Legislative Decree 196/03, as amended by D. LGS. 101/2018). Users/visitors are therefore requested to carefully read this Privacy Policy before sending any personal information via e-mail and/or filling in any electronic form on the site.

### Subject of the processing

#### Navigation data

The computer systems and software procedures used to operate this site acquire, during normal operation, some personal data that are then implicitly transmitted in the use of Internet communication protocols.

This is information that by its nature could, through associations and processing with data held by third parties, allow users/visitors to be identified (eg IP address, domain names of computers used by users/visitors connecting to the site, etc.).

This data is used only for statistical information and to check the correct functioning of the site.

The data on web contacts are not stored, however, for more than seven days, except for any verification of computer crimes against the site.

No data deriving from the web service will be communicated or disseminated.

#### Data provided voluntarily by users/visitors

If users/visitors, connecting to this site, send their personal data to access certain services, or to make requests in electronic mail, even by sending CVs, they are aware that this involves the acquisition by the owner of the 'sender's address and/or any other personal data that will be processed exclusively to respond to the request, or for the provision of the service.

Personal data provided by users/visitors will be communicated to third parties only if the communication is necessary to comply with the requests of the users/visitors themselves or by law (as in the case of billing, or any recruitment following sending CV).

#### Cookies

In addition to the data expressly given to the Owner, other data deriving from the user's navigation on the site may be recorded: in fact, when the user accesses it, the site may send the user a "cookie". A "cookie" is a small text file that the site can automatically send to your computer when you view our pages. The "cookies" are used to make browsing more convenient, as well as to obtain information on the navigation of the individual user within the site and to allow the operation of some services that require identification of the user's path

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through different pages of the site. For any access to the site, regardless of the presence of a “cookie”, the Website records the type of browser (eg Internet Explorer, Chrome, Firefox), the operating system (eg Windows, Macintosh) and the host and the URL from the user-browser source, in addition to the data on the requested page. This data can be used in aggregate and anonymous form for statistical analysis on the use of the site. For the complete management of cookies, consult the “Cookie policy” page of this site.

### **Website forms**

On the site there are several forms that can be filled by the user

“Work with us”: the data collected are: name, surname, email address, telephone number, status, Skype account, curriculum vitae attachment, message

“Get a quote”: the data collected are: name, surname, email, message

“Stay updated”: the data collected through the Mailwizz service are: name, surname, email

“Download Form”: the data collected are: name, surname, organization, job title, email, phone number

“Get in contact”: the data collected are: name, surname, organization, job title, email, phone number, message

These data, unless requested to be canceled by the interested party, are kept for the time necessary for the purposes for which they were collected and subjected to periodic checks. Cancellation occurs on the React4life server and through secure wiping on the devices.

The React4life website is currently hosted on a private server.

### **Processing methods**

The processing is carried out through automated tools (for example using electronic procedures and supports) and/or manually (for example on paper) for the time strictly necessary to achieve the purposes for which the data were collected and, in any case, in compliance with the regulations in force on the subject.

Specific security measures are observed to prevent the loss of data, illicit or incorrect use of the same and unauthorized access, so as to allow access only to those appointed or responsible appointed in accordance with the laws in force. The list of Managers appointed pursuant to Article 28 of EU Regulation 679/2016 is available at the Data Controller’s registered office.

### **Purpose of the processing**

In addition to those indicated in the individual information preceding the compilation of the forms of the various sections of the site, the purposes of the processing carried out by the Owner must be understood as:

- collection and conservation and processing for the purpose of establishing and operating and administrative management of the contractual relationship connected to the provision of the service offered on the site;
- use of the user’s personal data (in particular the e-mail address) to make communications relating to the performance of the established or potential contractual relationship;

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- processing of personal data provided and those derived from browsing on the site in order to provide a service consistent with the information transmitted during the use of the service;
- data collection, storage and processing to perform statistical analysis in anonymous and/or aggregate form;
- purposes functional to the performance of our business, such as offering personalized content such as, for example, newsletter services;
- for the communication of commercial information on future initiatives, announcements of new products or services;
- for market research, statistical and economic analysis;
- to send advertising or promotional material, and to perform prize games, promotional initiatives in general.

### Legal basis of the processing

Under the **General Data Protection Regulation (GDPR)**, the legal basis for processing customer data via the site at the time of registration is based on the **request**, the **contract**, or any **pre-contractual agreements** with the data subject. If these conditions are not met, the processing is based on the data controller's **legitimate interest**. For additional purposes, such as **profiling**, consent is required and serves as a valid legal basis for further data processing.

### Recipients

In addition to the Owner, in some cases, the categories of managers and authorized parties involved in the corporate organization of the Site (administrative, commercial, marketing, legal, system administrators) may have access to the data. Furthermore, the Data Controller may use external parties (such as third party technical service providers, transporters, hosting providers, cloud services, IT companies, communication agencies) also as Data Processors. The updated list of Data Processors may always be requested from the Data Controller, by contacting the address indicated above.

### Transfer to a third country

The data controller uses servers located in the following countries for the services offered by the site:

Italy

Europe

and therefore, on the basis of Reg. 2016/679/EU to be considered suitable as they fall within the EU framework, however Countries considered by the European Commission to be subject to an adequacy decision.

The data processed by the Data Controller will never be disclosed.

If for reasons of technical and/or operational nature it is necessary to make use of other subjects located outside the European Union, we inform you as of now that these subjects will be appointed Data Processors pursuant to and for the purposes of Article 28 of the Rules and the transfer of your Personal Data to these

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subjects, limited to the performance of specific processing activities, will be regulated in compliance with the provisions of Chapter V of the Regulation.

All the necessary precautions will therefore be taken in order to guarantee the total protection of your Personal Data basing this transfer:

(a) on adequacy decisions of the recipient third countries expressed by the European Commission; (b) on adequate guarantees expressed by the recipient third party pursuant to Article 46 of the Regulation; (c) on the adoption of binding corporate rules, c.d. corporate binding rules.

### **Place of data processing**

The processing operations connected to the web services of this site take place at the aforementioned offices of the Data Controller and are only handled by technical personnel of the office in charge of processing. The data connected to the newsletter service can be processed by the personnel of the company that manages the Data Center (data processor in accordance with Article 29 of the Code regarding the protection of personal data), at the headquarters of the company itself, which takes care of the Ownership with related obligations.

### **Times and place of data storage**

The data is processed for the time necessary to perform the service requested by the User and then destroyed with safe means of destruction, such as paper shredders and wiping for data on IT support.

Data relating to profiling and geolocation are destroyed 12 months after the last purchase or contact with the User.

### **Optional or mandatory provision of data**

Apart from that specified for navigation services that acquire data automatically, users/visitors are free to provide their personal data or not to provide it. Failure to provide such data may only result in the impossibility of obtaining what is requested. The optional, explicit and voluntary sending of electronic mail to the addresses indicated on this site, or the completion of the Form entails the subsequent acquisition of the sender's address, necessary to respond to requests for services and/or information, as well as any other data personal information included in the message.

### **Rights of interested parties**

The parties to whom the personal data processed by the Data Controller refer have the right at any time to exercise their rights under EU/2016/679. Requests should be addressed to: React4life, with registered office in Genoa, Via Fiasella, 1/11, CAP 16121 or by e-mail: [privacy@react4life.com](mailto:privacy@react4life.com), or [info@react4life.com](mailto:info@react4life.com), telephone: 010-8599011.

In particular, the interested party has the right to obtain from the data controller:

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confirmation that personal data concerning him is being processed and in this case, to gain access to personal data and related information (art. 15);

the correction and deletion of data (art. 16 and art. 17);

limitation of data (art. 18);

certification that the operations referred to in points 2) and 3) above have been brought to the attention of those to whom the data have been communicated, provided that this is not impossible or involves a disproportionate use of resources (art. 19);

Right to data portability (art. 20);

Right of opposition (art. 21);

The right to object to automated decision-making relating to natural persons, including profiling (Article 22);

The interested party has the right to withdraw his consent at any time (Article 7);

The User also has the right to lodge a complaint with the supervisory authority responsible for the protection of personal data for any violation he believes he has suffered and that for Italy is the Guarantor for the protection of personal data. The complaint can be submitted via e-mail, to the address: [garante@gpdp.it](mailto:garante@gpdp.it), by fax: 06 696773785, or by mail, to the Guarantor for the protection of personal data, which is based in Rome (Italy), Piazza Venezia n. 11 – Cap 00187.

#### **Automated decision-making processes**

No automated decision-making processes are carried out on the data collected.

#### **What are cookies and what are they used for**

A cookie is a text file that a website visited by the user sends to its terminal where it is stored and then re-transmitted to that site on a subsequent visit.

#### **Cookies are distinguished:**

- according to the person who installs them on the user's terminal, depending on whether he is the same site manager that the user is visiting (so-called "first-party cookies") or a different site, which installs cookies through the first site (so-called "third-party cookies");
- according to the purpose of each cookie: some cookies allow the website that installed them to remember, for example, the preferences expressed by the user while browsing or to make a purchase or to authenticate (cd "technical cookies"), other cookies allow the site that installed them to monitor the user's browsing also for the purpose of sending advertising or offering services in line with the preferences expressed by the user while browsing the net (so-called "profiling cookies").

#### **Technical cookies**

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Technical cookies are used for the sole purpose of “transmitting a communication over an electronic communication network, or as strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide this service”. Cookies of this type are necessary for the proper functioning of some areas of the site. Cookies in this category include both persistent cookies and session cookies. Without these cookies, the site or parts of it may not work properly. Therefore, they are always used, regardless of user preferences.

Cookies in this category are always sent from our domain. Technical cookies can be divided into:

- browsing or session cookies, which guarantee the normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access restricted areas);
- analytics cookies (e.g. Google Analytics), similar to technical cookies when used directly by the site manager to collect information, in aggregate form, on the number of users and how they visit the site;
- functionality cookies, which allow the user to browse based on a series of selected criteria (for example, the language, the products selected for purchase) in order to improve the service rendered to the same.
- It should be noted in particular that the Google Analytics tool used on this website collects visitors’ IP addresses to provide an indication of their geographical location. This method is known as IP geolocation. Google Analytics does not report information on the actual IP addresses of visitors. Due to the use of a method known as IP masking, Google Analytics communicates information so that only part of the IP address is used for geolocation, rather than the entire address.

You can download the browser add-on component to deactivate Google Analytics at this address <https://tools.google.com/dlpage/gaoptout> . The add-on tells the Google Analytics JavaScript code (ga.js) to indicate that information about the visit to the website should not be sent to Google Analytics. The browser add-on for deactivating Google Analytics does not prevent the information from being sent to the website itself.

The use of technical cookies does not require the consent of the interested party.

### **Cookies for the integration of Third-Party functionalities**

Cookies of this type are used to integrate third-party functionalities on the Website (for example, integration with social networks or advertising services). Cookies in this category can be sent from the domains of the partner sites (or which in any case offer the features present on the site) and can use the information on the user’s visit to show them advertisements that may be of interest to them. Browsers are automatically set to accept cookies. We assume that by browsing our site, you consent to the placement of our cookies to improve your online experience.

### **Information pursuant to art. 13 of Reg. 2016/679/EU**

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With respect to the information collected by cookies installed directly from the Site, the data controller specifies the following:

- the data is collected only for the purposes and for the duration indicated in the table below and is processed by computer;
- as regards “technical” cookies, it is reiterated that the use of these cookies does not require the prior consent of the user since these are cookies necessary to allow navigation within the Site and its correct functioning. In case of removal of technical cookies through the browser settings, browsing the Site may not be, in whole or in part, possible;
- profiling cookies are used to allow the owner to know the user’s preferences and for them the consent of the interested party is required;
- the data collected by the first-party cookies may be communicated to subjects acting on behalf of the Data Controller as managers, designated or authorized for the processing, for purposes related to those described above. With respect to such data, the user can exercise the rights set forth in Reg. 2016/679/EU, as indicated in the Information on the processing of personal data accessible through the “Privacy Policy” link in the footer of the Site.

The site uses the following cookies that can be disabled by following the instructions below:

Name	Supplier	Type	Expiration	Purpose
CookieConsent	react4life.com	HTTP	1 year	It stores the status of the consensus to cookies given by the user for the current domain
GPS	Youtube.com	HTTP	1 day	It registers a unique ID on mobile devices to allow tracking based on the geographical position GPS.
IDE	doubleclick.net	HTTP	1 year	It is used by Google DoubleClick to record and produce reports on user actions on the site after viewing or clicking on one of the advertiser’s advertisements in order to measure the effectiveness of an advertisement and present targeted

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				advertising to the user.
PREF	Youtube.com	HTTP	8 months	It registers a unique ID used by Google for statistics related to how the visitor uses the YouTube videos and on various internet sites.
VISITOR_INFO1_LIVE	Youtube.com	HTTP	179 days	It tries to estimate the speed of the user's connection on pages with integrated YouTube videos.
YSC	Youtube.com	HTTP	Session	It registers a unique ID for statistics related to which YouTube videos have been viewed by the user.
YT-REMOTE-CAST-INSTALLED	Youtube.com	HTML	Session	It stores the user's video player preferences using the built-in YouTube video.
YT-REMOTE-CONNECTED-DEVICES	Youtube.com	HTML	Persistent	It stores the user's video player preferences using the built-in YouTube video.
YT-REMOTE-DEVICE-ID	Youtube.com	HTML	Persistent	It stores the user's video player preferences using the built-in YouTube video.
YT-REMOTE-FAST-CHECK-PERIOD	Youtube.com	HTML	Session	It stores the user's video player preferences using the built-in YouTube video.

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YT-REMOTE-SESSION-APP	Youtube.com	HTML	Session	It stores the user's video player preferences using the built-in YouTube video.
YT-REMOTE-SESSION-NAME	Youtube.com	HTML	Session	It stores the user's video player preferences using the built-in YouTube video.

### Setting cookies

By default, many browsers automatically allow the use of cookies, but also offer the ability to control most cookies, including the ability to accept them or not and the procedure to delete them.

For more information on cookie control, see the "Tools" (or similar) section of the browser.

You can set the browser to receive a warning before accepting a cookie, having the possibility to decide whether to receive it or not. You can also completely disable cookies.

### How to disable cookies?

If you prefer not to receive cookies, you can still change your Internet browser settings to be notified whenever a cookie is proposed to your computer, or so that you can delete cookies already stored on your hard drive.

Please note that by preventing us from placing cookies on your computer during the visit (including essential cookies), or by deleting cookies after they have been placed, you could influence the functionality of our site and compromise its effective use by the user. This applies to all websites, as well as ours, once cookies are disabled through the browser settings.

Most browsers (Internet Explorer, Firefox, Chrome, etc.) are configured to accept cookies. The cookies stored on the hard disk of the device can still be deleted and it is also possible to disable cookies by following the instructions provided by the main browsers, at the following links:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>
- Explorer: <http://windows.microsoft.com/en-en/internet-explorer/delete-manage-cookies#ie=ie-10>
- Opera: <http://www.opera.com/help/tutorials/security/privacy/>
- Safari: <https://support.apple.com/en-en/guide/safari/sfri11471/mac>

### Social Media Cookies

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Our presence in the Social Media aims to create a community and increase online visibility. By clicking on the LinkedIn/Facebook/Youtube/X button on our website, you will be redirected to the specific social media site, which have their own cookie and privacy policies over which we have no control.

## How to disable third-party services cookies

- FACEBOOK information: <https://www.facebook.com/help/cookies/>
- FACEBOOK (configuration): log in to your account. Privacy section.
- TWITTER information: <https://support.twitter.com/articles/20170514>
- TWITTER (configuration): <https://twitter.com/settings/security>
- LINKEDIN information: <https://www.linkedin.com/legal/cookie-policy>
- LINKEDIN (configuration): <https://www.linkedin.com/settings/>
- Google+ information: <http://www.google.it/intl/it/policies/technologies/cookies/>
- Google+ (configuration): <http://www.google.it/intl/it/policies/technologies/managing/>

## Minor age persons

This Website and the Services of the Data Controller are not intended for persons under the age of 18 and the Data Controller does not intentionally collect personal information referring to minors. In the event that information on minors is unintentionally registered, the Owner will delete them in a timely manner, at the request of users.

## Final clauses

Given the current state of evolution of the legislation on the protection of personal data, we inform you that this privacy policy may be subject to updates.

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