

Extended cookie policy

The company **Sirap Gema S.p.A.**, with registered office at Via Industriale 1/3, 25028 Verolanuova (BS), Italy, (hereinafter “**Sirap**” or “Data Controller”) hereby informs you under Art. 13 of Italian Legislative Decree no. 196/2003 (Personal data protection code) and under the provision “*Identification of the simplified procedures for the information and the acquisition of consent for the use of cookies*” of 8 May 2014 as issued by the Italian Data Protection Authority, and provides you with the following information as to the cookies installed on the domain <http://www.sirapgema.it/> and its subdomains (hereinafter **Website**).

This document also contains the information required pursuant to Art. 13 of the European Regulation no. 2016/679 concerning the protection of individuals with regard to personal data processing (hereinafter “GDPR”), which came into force on 24 May 2016 and is applicable as from 25 May 2018. The foregoing is without prejudice to any amendments and adjustments of this document becoming necessary after the abrogation of Italian Legislative Decree no. 196/2003 occurring on 24 May 2018, as well as due to any European or national legislative measures and/or provisions of the Supervisory Authorities following the publication hereof.

What are cookies?

Cookies are data created by a server that are stored in text files on the hard disk of the computer or on any device used by the user to access the Internet (such as smartphones and tablets) and allow to collect information on the user's navigation on the Website.

Cookies can be stored permanently on your computer and have a variable duration (the so-called persistent cookies), but they can also disappear when the browser is closed or have a limited duration (the so-called session cookies).

Cookies may be installed by the website you are visiting (the so-called first-party cookies) or may be installed by other websites (the so-called third-party cookies).

Cookies used and purposes

Cookies for which your consent is not required

- **First-party navigation cookies**

Sirap uses first-party navigation cookies to allow users a safe and efficient navigation and use of the Website.

- **First-party functionality cookies**

Sirap uses first-party functionality cookies to keep track of users' choices.

- **Cookies for third-party media players**

Sirap uses cookies for third-party media players to store technical data necessary for playing video or audio contents, such as image quality, speed of network connection and buffering parameters.

- **Third-party analytical cookies**

Sirap uses cookies from the Google Analytics platform to collect aggregate information on the use of the Website by users (number of visitors, pages visited, time spent on the site, etc.). For the use of these cookies Sirap has adopted tools that reduce the identifying power of cookies (IP address masking) and tools that do not allow the collected information to be matched with other information in its possession.

Cookies for which your consent is required

- **Third party profiling cookies**

Sirap uses cookies from the Google AdWords platform to track users and send advertising messages in line with user preferences.

- **Third-party social cookies**

Sirap uses third-party social cookies to allow users to interact with social networks (such as LinkedIn and Instagram) and in particular to share the Website contents through the aforementioned social networks.

The characteristics of the cookies used on the Website are shown in the tables below.

Necessary (2)

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Name	Provider	Purpose	Expiry	Type
CookieConsent	sirapgroup.com	Stores the user's cookie consent state for the current domain	1 year	HTTP Cookie
PHPSESSID	sirapgroup.com	Preserves user session state across page requests.	Session	HTTP Cookie

Statistics (9)

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Name	Provider	Purpose	Expiry	Type
@@History/@@scroll #	youtube.com	Pending	Session	HTML Local Storage
__utma	sirapgroup.com	Collects data on the number of times a user has visited the website as well as dates for the first and most recent visit. Used by Google Analytics.	2 years	HTTP Cookie
__utmb	sirapgroup.com	Registers a timestamp with the exact time of when the user accessed the website. Used by Google Analytics to calculate the duration of a website visit.	Session	HTTP Cookie
__utmc	sirapgroup.com	Registers a timestamp with the exact time of when the user leaves the website. Used by Google Analytics to calculate the duration of a website visit.	Session	HTTP Cookie
__utmt	sirapgroup.com	Used to throttle the speed of requests to the server.	Session	HTTP Cookie
__utmz	sirapgroup.com	Collects data on where the user came from, what search engine was used, what link was clicked and what search term was used. Used by Google Analytics.	6 months	HTTP Cookie
_ga	sirapgroup.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years	HTTP Cookie

Name	Provider	Purpose	Expiry	Type
_gat	sirapgroup.com	Used by Google Analytics to throttle request rate	Session	HTTP Cookie
_gid	sirapgroup.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	Session	HTTP Cookie

Marketing (6)

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Name	Provider	Purpose	Expiry	Type
BX	flickr.com	Set by the ticket service, Flickr, when embedded Flickr content is displayed on the website.	1 year	HTTP Cookie
GPS	youtube.com	Registers a unique ID on mobile devices to enable tracking based on geographical GPS location.	Session	HTTP Cookie
NID	google.com	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads.	6 months	HTTP Cookie
VISITOR_INFO1_LIVE	youtube.com	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.	179 days	HTTP Cookie
xb	flickr.com	Pending	1 year	HTTP Cookie
YSC	youtube.com	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session	HTTP Cookie

How to change cookie settings

When accessing any page of the Website a banner is displayed containing a brief notice. You consent to the use of cookies by closing the banner, continuing browsing, accessing another area of the Website or selecting one of its elements (such as an image or a link). The consent to the use of cookies is registered with a "technical cookie".

You can view the notice and learn how to disable third-party cookies by clicking on the links in the "Further information" column of the table above.

You can also object to have cookies recorded on your hard drive by setting your browser so as to disable cookies. The following are the methods offered by the main browsers:

- Microsoft Edge <https://privacy.microsoft.com/it-it/windows-10-microsoft-edge-and-privacy>
- Chrome <https://support.google.com/accounts/answer/61416?hl=it>
- Firefox <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>
- Opera <http://help.opera.com/Windows/10.00/it/cookies.html>
- Safari https://support.apple.com/kb/PH19214?locale=it_IT

After this, however, some web page functions may not be performed correctly.

Recipients

The data collected using cookies may be processed by Sirap employees and collaborators, acting as Persons in charge of the processing and Data Processors.

Such data shall also be processed by trustworthy companies which carry out tasks of a technical and organizational nature on our behalf. Such companies directly co-operate with us and act as Data

Processors.

In particular, as part of the processing of data carried out through the Website, Sirap has appointed the following Data Processor:

- the company Huovo S.r.l. which deals with the management and technical maintenance of the Website.
- the company Seeweb S.r.l. which deals with the hosting of the Website.

Their list is constantly updated and is available upon request by sending an email to morethanpackaging@sirapgroup.com

The data collected by using cookies shall not be disclosed.

Data transfer in countries not belonging to the European Union

The data collected by using cookies are not transferred to countries outside the European Union by the hosting provider.

Your rights

In relation to the personal data processed by the Data Controller, the Data Subject has the right to exercise his/her rights pursuant to Article 7 of the Code shown in full at the end of this document and, in particular, to require the access to his/her personal data and/or rectification and/or erasure thereof and/or opposition to their processing and, in addition to this, the Data Subject shall also have the right to limit the processing thereof as from 25 May 2018. Furthermore, without prejudice to any other administrative or judicial appeal, the Data Subject may personally lodge a complaint to the supervisory authority.

Also starting as from 25 May 2018, in addition to the aforementioned rights the Data Subject may also exercise also the right to data portability, as per Art. 20 of GDPR. In the latter case, the Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Data Controller to which the personal data have been provided.

These rights can be exercised by sending an e-mail to: morethanpackaging@sirapgroup.com or a written communication to the address indicated below and, in the case of portability, the Data Subject may request that the data be transmitted directly from the Data Controller to another data controller, where technically feasible and correctly identified.

Contact details of the Data Controller, Data Processor and Data Protection Officer

The Data Controller is Sirap Gema S.p.A., in the person of its legal representative *pro tem*, with registered office at Via Industriale n. 1/3, 25028 Verolanuova (BS), Italy, phone +39 030 93681.

The Data Processor is Huovo S.r.l.

Last updated: February 2018

Art. 7 of Italian Legislative Decree no. 196/2003. Data Subject's rights.

1. The Data Subject shall have the right to obtain confirmation as to whether or not personal data concerning him/her exist, regardless of their being already recorded, and communication of such data in intelligible form.
2. The Data Subject shall have the right to be informed:
 - a. of the source of the personal data;
 - b. of the purposes and methods of the processing;
 - c. of the logic applied to the processing, if the latter is carried out with the help of electronic means;
 - d. of the identification data concerning data controller, data processors and the representative designated as per Section 5(2);
 - e. of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.
3. The Data Subject shall have the right to obtain:
 - a. updating, rectification or, where interested therein, integration of the data;

b. erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;

c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

4. The Data Subject shall have the right to object, in whole or in part:

a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;

b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.