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## **Cookie Policy**

Latest update: December 24, 2019

Cookies consist of portions of code installed in the browser that assist the Owner in providing the Service according to the purposes described. Some of the purposes for which Cookies are installed may also require the User's consent.

Where the installation of Cookies is based on consent, such consent can be freely withdrawn at any time following the instructions provided in this document.

# Technical Cookies and Cookies serving aggregated statistical purposes

### Activity strictly necessary for the functioning of the Service

This Website uses Cookies to save the User's session and to carry out other activities that are strictly necessary for the operation of this Website, for example in relation to the distribution of traffic.

### Activity regarding the saving of preferences, optimization, and statistics liability

This Website uses Cookies to save the User's session and to carry out other activities that are strictly necessary for the operation of this Website, for example in relation to the distribution of traffic.

### Other types of Cookies or third parties that install Cookies

Some of the services listed below collect statistics in an anonymized and aggregated form and may not require the consent of the User or may be managed directly by the Owner - depending on how they are described - without the help of third parties.

If any third party operated services are listed among the tools below, these may be used to track Users' browsing habits – in addition to the information specified herein and without the Owner's knowledge. Please refer to the privacy policy of the listed services for detailed information.

### **Advertising Cookies**

### How to customize advertising tracking preferences

Select advertising services adhere to the IAB Transparency and Consent Framework and allow the User to set advertising tracking preferences.

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### **Other Cookies**

### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

### Facebook Ads conversion tracking (Facebook pixel) (Facebook, Inc.)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on this Website. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network. Personal Data collected: Cookies and Usage Data.

Place of processing: United States - Privacy Policy. Privacy Shield participant.

#### Analytics collected directly (this Website)

This Website uses an internal analytics system that does not involve third parties. Personal Data collected: Cookies and Usage Data.

### Google Analytics (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. Personal Data collected: Cookies and Usage Data.

Place of processing: Ireland – Privacy Policy – Opt Out. Privacy Shield participant.

### How to provide or withdraw consent to the installation of Cookies

In addition to what is specified in this document, the User can manage preferences for Cookies directly from within their own browser and prevent – for example – third parties from installing Cookies.

Through browser preferences, it is also possible to delete Cookies installed in the past, including the Cookies that may have saved the initial consent for the installation of Cookies by this website. Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses: <u>Google Chrome, Mozilla Firefox, Apple Safari</u> and <u>Microsoft Internet Explorer</u>.

With regard to Cookies installed by third parties, Users can manage their preferences and withdrawal of their consent by clicking the related opt-out link (if provided), by using the means provided in the third party's privacy policy, or by contacting the third party.

Notwithstanding the above, the Owner informs that Users may follow the instructions provided on the subsequently linked initiatives by the <u>Your Online Choices</u> (EU), the <u>Network Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.



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### **Owner and Data Controller**

Baarerstrasse 125, 6300 Zug, Switzerland Owner contact email: <a href="mailto:contact@zen-own.com">contact@zen-own.com</a>

Since the installation of third-party Cookies and other tracking systems through the services used within this Website cannot be technically controlled by the Owner, any specific references to Cookies and tracking systems installed by third parties are to be considered indicative. In order to obtain complete information, the User is kindly requested to consult the privacy policy for the respective third-party services listed in this document.

Given the objective complexity surrounding the identification of technologies based on Cookies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of Cookies by this Website.

### **Definitions and legal references**

### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Data Supervisor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

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### This Website (or this Application)

The means by which the Personal Data of the User is collected and processed.

### Service

The service provided by this Website as described in the relative terms (if available) and on this site/application.

### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### Cookies

Small sets of data stored in the User's device.

### **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Website, if not stated otherwise within this document.

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