



Cookies Policy

(version 1.0 dated 1st December 2019)

Dear Visitor (hereinafter, "**You**" or the "**User**"),

This Internet website (www.frame-adv.com) (hereinafter, the "**Website**") is owned by the company Frame Adv Srl Via Aurelio Saffi 15, 25121 Brescia P.iva 04031510987, (Italia), registered with the Company Register (hereinafter, "**We**" or the "**Company**")

Since our Website uses the so called cookies for several purposes, we hereby aim at explaining to You what cookies are and how they are used on the Website.

Certain cookies (the so called proprium cookies or first party cookies) are conveyed and controlled by us directly. The Company collects and processes your personal data by means of these cookies. We hereby explains to You how We collect such data, for which purposes and what your rights are, also pursuant to Article 13 of the General Data Protection, Regulation (EU) 2016/679 (the "**GDPR**").

To the contrary, other cookies (the so called third parties cookies) are conveyed and controlled by third parties. This policy includes links to the policies published by such third parties. We hereby invite you to read such policies carefully.

If You are not familiar with cookies, please read carefully this policy and the general privacy policy of the Website, in order to make your choices consciously.

The Controller takes the utmost account of the right to privacy and protection of personal data of its Users. For any information related to this Cookie Policy, Users may contact the Controller at any time, using the following methods:

- Inviando una raccomandata a/r alla sede legale del Titolare **Frame Adv srl**, con sede legale in via Aurelio Saffi, 15 25121 Brescia Italia;
- Inviando un messaggio di posta elettronica all'indirizzo info@frame-adv.com

A. What cookies are and what they are for

The cookies are small text files that the websites visited by a user send directly to its terminal (usually, to the browser), where they are memorised to be transmitted to the same websites at the following visit of the same by the same user (the so called **proprium first party cookies**). During the web surfing of a website, a user may receive on its terminal also cookies of other websites or of other web servers (the so called **third parties cookies**); this happens because there may be elements on the visited website, such as images, maps, sounds, links to specific web pages of other domains that are on servers other than the server on which the requested page is placed. In other words, such cookies are set up on a website other than the one that is currently visited.

The cookies may have a duration limited to a single session of navigation on the browser (the so called **session cookies**), and, in such event, they deactivate automatically once the browser is closed by the user; or may have a predetermined duration and, in such event, they will remain memorised and active on your hard disk until the expiry date, thus continuing collecting information during different sessions of navigation on the browser (the so called **permanent cookies**).

The cookies are used for several purposes. Certain cookies are necessary in order to allow You to surf the Website and benefit of its functionalities (the so called technical cookies). Other cookies are used in order to obtain statistical information, whether in aggregate or not, about the number of users accessing the Website and how the Website is used (the so called **monitoring cookies or analytics**). To the end, other cookies are used in order to track your consumer profile and make You viewing advertisings that may be of interest for You, since complying with your preferences and your consumer habits (the so called **profiling cookies**).

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In order to know more in details such different categories of cookies please continue reading such policy. Please discover how they works and for what use they are for, and choose freely if you want to consent to their use or prevent the same.

B. The technical cookies

The technical cookies are used on the Website for the sole purpose to make You able to surf the Website and allow You to use its functionalities. They are first party cookies, since they are conveyed directly by us on the Website.

Certain technical cookies are essential to offer You an optimal surfing experience or in order to allow You to authenticate on the Website, for example in order to make a purchase on the Website or to enter into your reserved area (the so called **surfing cookies**). The surfing cookies are normally session cookies and, therefore, once the surfing browser is closed, are automatically deactivated.

The technical cookies are useful in order to allow You to memorise your preferences (for example, the language or the Country) without setting up the same at the following visits (the so called **functionalities cookies**). For such reason, the functionalities cookies are often lasting cookies, since they remain memorised on your computer also after the closure of the surfing browser, until the scheduled expiry date or until when you decide to eliminate the same.

The following technical cookies are actually used:

Cookie's denomination	Cookie's category	Cookie's function

As provided under the privacy law actually in force, the installation of such cookies does not require your prior consent. You are clearly free of blocking the installation of technical cookies, amending the settings of your browser (read paragraph E, No. 1, to know how to make it). Please consider, however, that blocking the installation of the technical cookies, or eliminating the same thereafter, the possibility to access the Website, to benefit of the same in whole or in part, to enable or disable certain functions or to receive certain services may be compromised in whole or in part.

C. Monitoring cookies or “analytics”

The analytics are used on the Website in order to collect statistical information, whether on aggregate or not, on the number of users accessing the Website and on how the same visit the same.

The analytics cookies of this Website are third parties cookies, since they are not conveyed directly by us they are not installed directly by the Company but by third parties subjects.

The following third parties analytics are installed on the Website without your prior consent, because they are less invasive since anonymised, given that third parties cannot access to analytics disaggregated data at the IP address level (in other words, using these cookies, third parties cannot go back to your identity):

Cookie's denomination	Cookie's category	Link to the policy / opt-out instructions

To the contrary, other third parties analytics cookies are installed on the Website with your prior consent, since the same are not anonymised, given that third parties can access to analytics disaggregated data at the IP address level

(in other words, using these cookies, third parties could theoretically go back to your identity by means of the IP address):

Cookie's denomination	Cookie's category	Link to the policy / opt-out instructions

For this reason, a specific banner is clearly displayed when you access the Website, informing you that (i) third parties analytics cookies are used on the Website and that (ii) closing the banner, surfing on the home page or clicking whatever element on the home page outside the banner, You are giving your consent to the use of cookies. In the event that you express your consent to the use of cookies in this way, We will track your consent by means of a specific technical cookie. In this way, we will avoid you displaying the cookies banner during your following visits of the Website. Please take into account that, in the event that you remove from your browser such technical cookie with the modalities set forth under the following paragraph E, No. 1), the track of your consent would be lost and, therefore, the cookies banner will be displayed again during your following visit to the Website.

You are clearly free to block the installation of analytics cookies in any moment whatsoever and this will not compromise in any manner whatsoever the possibility to visit the Website and benefit of its contents. Please read carefully the third parties cookies policies, following the links specified in the above table, in order to know how to do it.

D. How to manage the cookies and oppose to their use

There are several options to manage, disable and remove the cookies. .

(1) Modify your browser settings

Please follow the instructions provided by your browser's producer to discover how to manage, disable or remove all the cookies (technical, analytics and profiling):

- **Explorer:** <https://support.microsoft.com/en-us/kb/196955/it>
- **Chrome:** <https://support.google.com/chrome/answer/95647?hl=it>
- **Firefox:** <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>
- **Safari:** https://support.apple.com/kb/PH17191?locale=it_IT
- **Opera:** <http://help.opera.com/Windows/10.00/it/cookies.html>

Please be careful in making your choice. Indeed, by blocking the receipt of all the cookies indiscriminately, including the technical ones, without providing a specific exception for the Website, you might be no more able to surf on the Website or to benefit, in whole or in part, of its functionalities. Furthermore, removing all the cookies from the browser, also the technical cookies could be removed and, therefore, you could remove the preferences set up by using the Website or no more find products or services included in your basket.

(2) Use our interactive instruments or those provided by third parties

In order to disable the first party profiling cookies, which means those installed directly by us, you can simply use the interactive button that is displayed under Paragraph D of this policy. Your choice to oppose to the use of such cookies will not have any consequences on the possibility to surf on the Website and to use its functionalities, and could be revoked by you at any time whatsoever by using the same button.

In order to disable the third parties cookies, please see the privacy policies of those third parties installing analytics cookies (see paragraph C above) or profiling cookies (see paragraph D above) in order to know the other instruments available to you for managing, disabling and removing cookies and, more in general, to oppose to their use. Please be reminded that, by disabling third parties cookies, (i) you are opposing to their use not only on the Website, but on all the Internet websites on which such cookies are used and (ii) the possibility to surf on the Website and use its functionalities will not be jeopardised in any manner whatsoever. When you disable the third parties cookies, you will however display the banner on the cookies on the Websites's home page; but, in such event, closing the banner and surfing the home page or clicking an element whatsoever outside the banner, you will not receive any third party cookie you have duly disabled.

(3) **Use the Internet website Internet www.youronlinechoices.eu/it/**

Your Online Choices is an Internet website managed by the non-profit organisation *European Interactive Digital Advertising Alliance* (EDAA), the Italian version of the same is available at the address www.youronlinechoices.eu/it/, providing information on the behavioural advertisings based on profiling cookies (<http://www.youronlinechoices.com/it/a-proposito>) and allow the Internet users to oppose easily (opt-out) to the installation of the main profiling cookies installed by the marketing operators and used on Internet websites (<http://www.youronlinechoices.com/it/le-tue-scelte>). Before using this instrument, we hereby recommend you to read carefully the general terms and conditions of the site Your Online Choices (<http://www.youronlinechoices.com/it/condizioni-general-di-servizio>), the frequent asked questions (FAQ) (<http://www.youronlinechoices.com/it/faqs>) and the users' guide (<http://www.youronlinechoices.com/it/help>).

Please use Your Online Choices consciously. Indeed, notwithstanding that many of the most important marketing companies using cookies are members of the same, certain third parties installing cookies through the Website could not be members of Your Online Choices. Therefore, the use of Your Online Choices does not guarantee that third parties cookies will be received surfing on the Website. Please be reminded that, removing all the cookies from the browser, also the technical cookies released by Your Online Choices in order to remind your choices could be removed, thus reactivating third parties cookies.

F. Processing methods and data retention timing

As highlighted under the preamble of this Cookie Policy, the Company collect and process certain personal data by means of the cookies conveyed directly on the Website (first party cookies). The Company acts as data controller of such data, in compliance with the provisions of the GDPR. Please note that we will process your data with electronic instruments only, in a much automatised manner and without any human intermediation. Therefore, our employees and coworkers will never access the content of your personal data obtained by means of cookies, meaning that they will never be able to see and/or have any direct Personally Identifiable Information (PII).

Certain employees of ours and coworkers, appointed by us as data controllers, could make maintenance operations on IT systems that host your data, without the possibility to access their actual contents. The personal data could be memorised on servers managed by third parties (for example, providers of IT systems) or may be managed by online marketing specialised subjects, acting as external data controllers on the basis of a specific written appointment by the Company. We hereby inform you that, complying with the requirements and the guarantees provided under the law, your data could be transferred to Countries outside the European Economic Union that could not guarantee a level of privacy and personal data protection equal to the level of protection guaranteed by the Italian and European privacy laws, but as Controller we take the utmost account of the right to security, therefore we will process such transfers with all due care and guarantees. Your personal data will not be transferred to third parties data processors, nor will be disseminated.

G. Your rights

In order to exercise your rights, or to obtain any other information or clarification in relation to this Cookie Policy, please contact the Company by means of:

- Inviando una raccomandata a/r alla sede legale del Titolare **Frame Adv srl**, con sede legale in via Aurelio Saffi, 15 25121 Brescia Italia;
- Inviando un messaggio di posta elettronica all'indirizzo info@frame-adv.com

Pursuant to Privacy Laws, the Data Controller informs that Users have the right to obtain indication (i) of the origin of personal data; (ii) the purposes and methods of the processing; (iii) the logic applied in the event of processing carried out with the aid of electronic instruments; (iv) of the identification details of the Controllers and Processors; (v) the subjects or categories of subjects to whom the personal data may be communicated or who may come to know them as Processors.

Furthermore, Users have the right to obtain:

- a) access, updating, rectification or, when interested, integration of data;
- b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where this fulfillment is it proves impossible or involves a use of means manifestly disproportionate to the protected right.

Furthermore, Users have:

- a) the right to withdraw consent at any time, if the processing is based on their consent;
- b) (and, if its is applicable) the right to data portability (right to receive all personal data concerning them in a structured format, commonly used and readable by automatic device), the right to limit the processing of personal data and the right to cancel (" right to be forgotten ");
- c) the right to oppose:
 - i) in whole or in part, for legitimate reasons, to the processing of personal data concerning them, even if pertinent to the purpose of the collection;
 - ii) in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication;
- d) if they believe that the processing that concerns them violates any Privacy Laws, the right to lodge a complaint with a Supervisory Authority (if a European citizen, in the Member State in which they usually reside, in the one in which they work or in the one in which the alleged violation has occurred). The Italian Supervisory Authority is the Garante per la protezione dei dati personali, located in Piazza di Monte Citorio n. 121, 00186 - Rome (<http://www.garanteprivacy.it/>).

The Controller is not responsible for updating all links that can be viewed in this Cookie Policy, therefore whenever a link is not functional and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to such link.