

Extended Cookie Policy (<https://www.humanitashospitals.ru/>)

1. Premise

This Cookie Policy refers exclusively to the website donazioni.humanitas.it ("**Website**") and must be considered as an integral part of the Privacy Policy of the website.

Humanitas Mirasole S.p.A. (hereinafter, "**Controller**", "**Humanitas**"), pursuant to art. 13 of the General Data Protection Regulation n. 2016/679 (hereinafter, "**GDPR**"), releases information regarding the processing of personal data through cookies and similar technologies present within the pages of the Website.

2. Data Controller

The Controller of the processing of personal data is Humanitas Mirasole S.p.A., VAT no. 10125410158, with registered office in Via Manzoni, 56-20089, Rozzano (MI), in the person of the legal representative *pro tempore*.

The Controller processes personal data in compliance with the principles of lawfulness, correctness, transparency, purpose and storage limitation, data minimization, accuracy, integrity and confidentiality.

3. Definitions, characteristics and legislation on cookies

Cookies are small text files sent by websites the user visits and stored on their computer or mobile device and then transmitted to the same websites the next time you visit. It is thanks to cookies that a website remembers the user's actions and preferences (for example, login data, the chosen language, font size, etc.), so that they do not have to be indicated again when the user returns to that website or navigates from one page to another. Cookies, therefore, are used to perform computer authentication, session monitoring and storage of information regarding the activities of users accessing a website. They may also contain a unique identification code that makes it possible to keep track of the user's navigation within the website itself for statistical or advertising purposes.

During navigation on a site, the user may receive on his computer the so-called "**first party**" cookies - if installed directly by the website manager - but also cookies from websites or web servers other than the one he is visiting (so-called "**third party**" cookies) installed on the terminal by a party other than the website manager.

Some operations could not be carried out without the use of cookies, which in some cases are therefore technically necessary for the operation of the website.

There are various types of cookies, depending on their characteristics and functions, which can remain on the user's computer for different periods of time. In this sense, we distinguish: the **so-called session cookies**, which are automatically deleted when the browser is closed and the **so-called persistent cookies**, which remain on the user's equipment until a predetermined expiry date.

According to the regulations in force in Italy, the use of cookies does not always require the express consent of the user. In particular, this consent is not required for the so-called "**technical cookies** or **strictly necessary cookies**, i.e. those used for the sole purpose of carrying out the transmission of a communication on an electronic communication network, or to the extent strictly necessary to provide a service explicitly requested by the user. In other words, these are cookies that are indispensable for the

functioning of the website or necessary to carry out activities requested by the user; they allow the user to take advantage of the contents and services in an easy way: in fact, for example, he will not have to carry out any action on the banner containing the short policy every time he accesses the Website because the choice of consents will be recorded. Strictly necessary cookies cannot be disabled and the user's prior consent is not required for their installation. These cookies are stored in the user's browser for the time necessary to ensure the proper functioning of the Website and in any case, in the case of persistent cookies, for a maximum of 1 year.

Among **technical cookies or strictly necessary cookies**, which do not require express consent for their use, the Guarantor for the Protection of Personal Data (see Provision "Identification of the simplified procedures for information and acquisition of consent for the use of cookies of 8 May 2014") also includes *first-party analytical cookies and anonymized third-party analytical cookies (Performance analytics cookies)*. The recent *Guidelines cookies and other tracking tools - June 10, 2021* - further clarify that analytics cookies are comparable to technical cookies only if it is precluded the possibility that it is achieved, through their use, the direct identification of the person (cd. single out), which is equivalent to preventing the use of analytics cookies that, due to their characteristics, can be direct and unique identifiers. In this case, the structure of the analytics cookie foresees the possibility that the same cookie is referable not only to one, but to more devices, so as to create a reasonable uncertainty on the computer identity of the interested party. As a rule, this effect is obtained by masking appropriate portions of the IP address of the cookie (indicatively, it is the obscuring of at least the fourth component of the address). Further clarifications concern the use of analytics cookies depending on whether they are first or third party. In this second case, the use of cookies is limited solely to the production of aggregate statistics and are used in relation to a single site or mobile application, so that the person's browsing is not tracked when using different applications or browsing different websites. Google Analytics cookies, however, do not fall into this category because, even with IP address masking, all data collected through Google Analytics remains traceable to the data subject. All cookies necessary for Third Party statistical analysis that do not imply IP address masking or otherwise such as to collect data traceable, even indirectly, to the data subject fall into the category of "performance analysis cookies" for which Humanitas requires explicit user consent. Conversely, the use of First Party analytics cookies is lawful, even in the absence of the adoption of the prescribed minimization measures, for statistical analysis relating to multiple domains, websites or apps traceable to the same owner as long as the latter proceeds on its own statistical processing, without in any case that such analysis results in an activity that, going beyond the boundaries of a mere statistical count, actually takes on the characteristics of a processing aimed at making decisions of a commercial nature (c.d. profiling purposes).

The user's prior consent is required for **profiling cookies or behavioural advertising cookies (targeting cookies)**, i.e. those aimed at creating profiles of the user and used to send advertising messages in line with the preferences expressed by the user while surfing the web. This type of cookie is used to track the user's navigation on the Website in order to analyse his behaviour for marketing purposes and obtain information on his tastes, habits and choices. In this way Humanitas can send the user targeted advertising messages in line with the preferences expressed by the user during navigation. In addition, to carry out a better targeting activity. These cookies are not necessary for the operation of the Website, therefore the user's consent is required for their installation.

Tracking tools include "tracking pixels," web beacons such as single-pixel-sized transparent images (1x1 images, usually a GIF file) that, when requested from the server, allow tracking of whether the user is

viewing the page containing it. Tracking pixels are generally installed for the purpose of user profiling for commercial reasons. The Owner plans to install the following pixels: Google (Google ADS), Google Analytics (tracking), Facebook and Klavyo

4. Types of cookies used by the Website

The Website uses different types of cookies as listed below.

- **Strictly necessary cookies (c.d. technical)**
- **Performance analysis cookies (c.d. analytical)**
- **Behavioural advertising cookies (c.d. profiling)**

It should be noted that with reference to third-party cookies, the user must refer directly to the relevant selection and de-selection procedures indicated by means of the links below.

ATTENTION: *If you disable certain cookies, the Website may not be accessible and certain services or features of the Website may not be available or may not function properly. As a result, the user may be required to change or manually enter certain information or preferences each time you visit the Website.*

- **Third-party cookies:**
 - [Google](#)
 - [Google Analytics](#) (Link to Google's website containing the add-on for deactivating the "Google Analytics" cookie)
 - [Hotjar](#)

In detail, the cookies sent by Humanitas Mirasole through the *Website* are listed below:

Nome	cookielawinfo-checkbox-necessary
Tipo di cookie	Necessary
Finalità e necessità di consenso	Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Necessary" category
Prima parte/Terza Parte	First Party
Persistenza	1 year

Nome	cookielawinfo-checkbox-analytics
Tipo di cookie	Necessary

Finalità e necessità di consenso	Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Analytics" category
Prima parte/Terza Parte	First Party
Persistenza	1 year

Nome	cookielawinfo-checkbox-advertisement
Tipo di cookie	Necessary
Finalità e necessità di consenso	Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Advertisement" category
Prima parte/Terza Parte	First Party
Persistenza	1 year

Nome	cookielawinfo-checkbox-preferences
Tipo di cookie	Necessary
Finalità e necessità di consenso	This cookie is set by the GDPR Cookie Consent plugin to check if the user has given consent to use cookies under the "Preferences" category
Prima parte/Terza Parte	First Party
Persistenza	1 year

Nome	CookieLawInfoConsent
Tipo di cookie	Necessary
Finalità e necessità di consenso	Records the default button state of the corresponding category & the status of CCPA. It works only in coordination with the primary cookie
Prima parte/Terza Parte	First Party
Persistenza	1 year

Nome	viewed_cookie_policy
Tipo di cookie	Necessary
Finalità e necessità di consenso	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not a user has consented to the use of cookies. It does not store any personal data

Prima parte/Terza Parte	First Party
Persistenza	1 year

Name	_ga
Type of cookie	Analytical
Purpose and need for consent	This service allows to understand how the user interacts with the content of the Website. This service, without active advertising features and masking the IP address, uses a set of cookies to collect information and generate statistics on the use of the Website such as counting and monitoring the number of page views.
First Party/Third Party	Third Party (Google Analytics)
Persistence	24 months

Name	_gid
Type of cookie	Analytical
Purpose and need for consent	This service allows to understand how the user interacts with the content of the Website. This service, without active advertising features and masking the IP address, uses a set of cookies to collect information and generate statistics on the use of the Website such as counting and monitoring the number of page views.
First Party/Third Party	Third Party (Google Analytics)
Persistence	24 hours

Name	_hjAbsoluteSessionInProgress
Type of cookie	Analytical
Purpose and need for consent	Used to count how many times a website has been viewed by different visitors; a random ID number is assigned to the visitor for this purpose, allowing the visitor not to be counted twice
First Party/Third Party	Third Party (Hotjar)
Persistence	Session

Name	_hjTLDTest
Type of cookie	Technical
Purpose and need for consent	Used to determine whether tracking can be shared between various subdomains (where applicable). After this check the cookie is removed.
First Party/Third Party	Third Party (Hotjar)
Persistence	Session

Name	_hjid
Type of cookie	Profiling
Purpose and need for consent	Sets a unique ID for the session. This allows the website to obtain data about visitor behavior for statistical purposes.
First Party/Third Party	Third Party (Hotjar)
Persistence	12 months

Name	_hjFirstSeen
Type of cookie	Analytical
Purpose and need for consent	This cookie is set to identify a new user's first session on the Website.
First Party/Third Party	Third Party (Hotjar)
Persistence	24 hours

Name	1P_JAR
Type of cookie	Profiling
Purpose and need for consent	This cookie allows to display personalized ads on Google websites, based on recent searches and previous interactions
First Party/Third Party	Third Party (Google)
Persistence	1 month

Name	APISID
Type of cookie	Profiling
Purpose and need for consent	This cookie allows to display personalized ads on Google websites, based on recent searches and previous interactions
First Party/Third Party	Third Party (Google)
Persistence	24 months

5. Cookie Settings

When you access the Website for the first time, there is a banner that contains a brief policy notice and a link that allows you to access the COOKIE MANAGEMENT section through which you can easily choose which cookies to install. You can access the Cookie Management area at any time and easily through a specific link in the footer of the Website.

In addition to the above, you can also change your cookie settings through your browser, deleting all or some cookies or limiting the sending of cookies to certain websites. Below are the instructions for changing the cookie settings for the most common browsers:

- [Microsoft Edge](#)
- [Google Chrome](#)
- [Safari](#)
- [Firefox](#)

Disabling cookies or deleting them may affect the optimal use of some areas of the Website or prevent certain features, as well as affect the operation of third party services.

The user can block or delete (in whole or in part) technical and functionality cookies through the specific functions of his browser.

6. Method of collecting consent to the use of cookies

When you access the *homepage* of the Website, there is a banner that contains a brief policy on cookies. The user has the faculty to accept or not, in a granular way, the cookies, possibly also of Third parties, through unequivocal choices as set in the banner of the homepage of the Website.

7. Transfer of personal data

Personal data collected by means of first-party cookies - i.e. installed by Humanitas Mirasole S.p.A. - present on the Website are not transferred outside the European Union. In any case, it is understood that, where necessary, the Data Controller may transfer personal data to non-EU countries, guaranteeing as of now that the transfer will take place in compliance with the applicable legal provisions and therefore entering into specific agreements that guarantee an adequate level of protection of personal data, or in any case adopting, if it is necessary, the standard contractual clauses provided by the European Commission for the transfer of personal data outside the EU.

With particular reference, on the other hand, to transfers of personal data carried out by means of third party cookies, please refer to the respective data processing policies in the links indicated in point 4 of this Cookie Policy.

8. Categories of recipients

Personal data collected through cookies may be shared with:

- persons authorized by the Data Controller to process personal data, as employees and/or collaborators pursuant to art.29, GDPR and 2-quaterdecies Privacy Code, who have received adequate operating instructions, are committed to confidentiality or are subject to an adequate legal obligation of confidentiality;
- persons delegated and/or appointed by the Data Controller to carry out activities strictly related to the pursuit of specific purposes (by way of example but not limited to, technical maintenance work on the systems), duly appointed as Data Processors pursuant to Article 28, GDPR.

9. Rights of the interested party

Consistent with the provisions of the GDPR, the user has the right to request from the Controller, at any time, access to his personal data, the rectification or deletion thereof or to object to their processing. The law also allows the user to exercise the right to request the limitation of processing in the cases

provided for by Article 18 of the GDPR, as well as to obtain in a structured, commonly used and machine-readable format the Data concerning him, in the cases provided for by Article 20 of the GDPR.

Requests may be directed to the Controller by writing to privacy@humanitas.it or privacy.humanitas@pec.it.

For any further activity related to data protection you can always refer to the Data Protection Officer (DPO), via Manzoni 113, 20089 Rozzano (Milano), email: dataprotectionofficer@humanitas.it.

If the interested party perceives a violation of the law in the processing of their personal data may complain to the Guarantor for the protection of personal data. This is without prejudice to the possibility of appealing to the competent judicial authority.

For further information regarding the rights and regulations on data protection in relation to cookies you can visit the website of the Guarantor Authority for the protection of personal data by clicking on the following link [Cookie - Garante Privacy](#).

10. Updates

This Cookie Policy may be subject to updates. Users are therefore invited to periodically check its content.