

COOKIE POLICY
Pursuant to Article 13 Regulation (EU) 2016/679
"General Data Protection Regulation"

The Website www.thrive-ahdtraining.org uses cookies and other tracking tools to (i) ensure its proper functioning and the delivery of related services; (ii) carry out aggregated statistical analyses to understand and improve the User's browsing experience (e.g., counting the number of visitors, understanding how popular a service or content is, etc.); (iii) analyse the preferences and browsing of Users who visit the Website. Hereinafter, the term "User" or "Users" will be used to refer to individuals browsing the Website.

The information below relates both to the use of cookies and to other tracking tools that may be used. For practicality, we will use the term "**cookie**" to refer to all the different tracking technologies, unless otherwise expressly indicated.

More detailed information about who we are, how we process personal data, how you can contact us and what your privacy rights are can be found in the [Privacy Policy](#) always accessible in the footer of the *website*.

Pursuant to Article 13 of Regulation EU 2016/679 General Data Protection Regulation (the "GDPR") and Directive 58/2002, as amended, Fondazione Penta ETS, as the Data Controller ("**Penta**" or the "**Foundation**" or "**we**"), provides the following information.

a) WHAT IS A COOKIE

Cookies are text files sent from a web server (i.e. the computer hosting the visited website) to the User's browser (Microsoft Edge, Mozilla Firefox, Google Chrome, Opera, Safari, etc.) and stored on the device, whether fixed or mobile, used for browsing. The cookie enables the Website to identify the User's device, based on the information stored in it, each time the User reconnects to the Website using that device.

Through the use of cookies, we can make your navigation of the Website easier, analyse your preferences and level of engagement by tracking your browsing activity, and consequently offer you content that better aligns with your interests and the Foundation's research activities.

Cookies can be either "session" cookies (when they are stored only for the duration of the browsing session and are deleted when the browser is closed), or "persistent" cookies (when they are stored for a longer period of time, until they expire or are deleted by the User).

Moreover, cookies or other tracking tools may be either "first party" (when they are created and used only by the owner of the website that issued them and are not shared with third parties) or "third party" (when they are issued and managed by parties other than Penta).

Cookies and tracking tools do not collect information that directly identifies the User.

b) WHAT TYPES OF COOKIES (OR TRACKING TOOLS) THE WEBSITE USES

Technical or necessary cookies

These cookies are used to ensure navigation and, therefore, the telematic transmission of data over the network. They are strictly necessary for browsing the Website.

These cookies may be either first-party or third-party and do not require the User's prior express consent as they are strictly necessary to provide the service requested by the User while navigating the Website.

Statistical or analytics cookies

Analytical cookies, including those from third parties, allow us to understand how Users interact with the Website. These cookies do not collect information that directly identifies you or reveals personal data. The information collected is normally processed in an aggregated form through the use of partial IP obscuration mechanisms. When data minimization techniques are applied and User identification is not possible, these cookies are treated as equivalent to technical cookies and do not require prior consent from the User. However, if such measures are not implemented, the use of these cookies will require the express and informed consent of the User.

Personalisation or performance cookies

Personalisation cookies record Users' preferences when using the Website (e.g., the language selected and specific country) or facilitate navigation, for example by storing data entered into forms (User input cookies), or recognising Users after they log -in (cookies for authentication). These instruments are not strictly necessary for browsing the Website and, if retained after closing the browser, they require the User's consent. Such cookies may be released either from first or third parties.

Profiling or advertisement cookies

These cookies are used to monitor User's activity patterns on the Website, including tracking the User's engagement with the activities and initiatives proposed therein, for example, to send content aligned with the User's interests and/or aimed at increasing the User's engagement. They may be either first-party or third-party cookies and session-based or persistent.

The use of these cookies requires the express and informed consent of the User.

Consent will be requested upon first access to the Website: afterwards, we will use a technical cookie to store your consent, allowing direct access to the Website pages during subsequent visits. Consent may be withdrawn at any time, as outlined in paragraph c) of the Cookie Policy.

No other User profiling tools are used on this Website without the User's explicit consent (e.g. spyware).

c) YOUR CONSENT

When accessing the Website, the User is presented with a warning banner containing information about Website's use of cookies and other tracking tools.

This banner provides a summary that enables the User to understand which cookies/tools are used and for what purposes; in addition, by clicking the "**Cookie settings**" button, the User can also check in detail which types of cookies and tools are used.

The User is therefore free to choose whether and which cookies to authorise.

We will record whether the User granted or denied consent so that the Website can be accessed directly without displaying the banner again, except in specific cases (e.g., if the User deletes cookies or if updates to the cookies usage require renewed consent or provision of new information).

NB: consent may be revoked at any time by simply clicking the "Privacy Overview" link located at the bottom of each page of the Website.

Consent applies exclusively to this Website.

d) DEACTIVATING/DELETING COOKIES VIA WEB BROWSER

You may deactivate/activate or delete cookies at any time by adjusting your web browser settings. If you do not wish to receive cookies, you can set your browser to warn you when a cookie is being sent, so that you can decide whether to accept it or not; you can also automatically refuse all cookies by activating the appropriate option in your browser. You can also delete specific cookies already stored, block certain websites from storing cookies on your computer, or block third-party cookies.

Each browser (Firefox, Chrome, Edge, Safari, Opera, etc.) has its own method for managing cookies. Within the settings or preferences panel, it is possible to modify/manage cookie-related parameters and/or delete them.

You can also manage your cookie preferences at <http://www.youronlinechoices.com>

e) WHO WILL HAVE ACCESS TO YOUR DATA

The personal data collected via cookies and other tracking tools will not be disclosed to the public and will be processed by specifically authorised persons within Penta, for the purpose of managing the Website and, where consent is provided, analyzing User's preferences and browsing behavior to deliver content aligned with the User's interests and/or aimed at increasing the User's engagement. The data will be also processed by (i) companies that offer services instrumental to the management of the Foundation's technological infrastructure; (ii) companies and/or consultants that offer services instrumental to the browsing of the Website; (iii) cookies' providers. Where necessary, Penta has appointed such processing recipients as Data processors pursuant to Article 28 of the GDPR. A list of all the Data processors designated by Penta can be requested by contacting Penta at legal@pentafoundation.org.

f) TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

Personal data might be the subject of transfer to countries not belonging to the European Union. The transfer of personal data will take place in full compliance with the guarantees, measures, and rights provided by the GDPR, usually based on adequacy decisions or standard contractual clauses approved by the European Commission.

To receive more information on the transfer of data and the safeguards set out for their protection, as well as on the means for obtaining that data or the place where they have been made available, send a simple request to legal@pentafoundation.org.

g) YOUR RIGHTS

By sending an e-mail to legal@pentafoundation.org, you may at any time exercise your rights under Articles 15 to 22 of the Regulation, including accessing your personal data, updating them, requesting their erasure, requesting a copy of them, revoking your consent or opposing to the processing of them.

h) DETAILS OF THE COOKIES AND TRACKING TOOLS USED BY THE WEBSITE

In order to allow you to make a free and informed choice, detailed information about (i) the provider and identification of cookies/tracking tools, (ii) their characteristics and purposes and (iii) their duration/expiry is available through the cookie scanner details accessible via the "Privacy Overview" link on all pages of the Website, where you can see the complete list of cookies/tracking instruments used on the Website.