

CAMPARI GROUP

1.1. Implementation of cookie notice for the website - Cookiebot

ACTION REQUIRED:

- **GPDP Office: provision of support for any clarifications needed**
- **Web Agency: Implementation of the Cookie notice leveraging on Cookiebot and premise/conclusion text(s) below**

With the help of Cookiebot you shall be able to easily define the cookie notice since it has a scanning functionality which discovers tracking technologies in place on the website. Cookiebot allows you to publish such information in a table format.

Leveraging on Cookiebot, Cookie must be classified as it follows:

- Necessary cookies
 - Analytics cookie can be classified under this category only if anonymization or pseudonymization functionalities have been activated, otherwise they must fall under the category “statistics cookies”
 - Google analytics cookie can be classified as necessary cookies only if specific parameters are applied (IP anonymization with gtag.js) as reported at the following link: <https://developers.google.com/analytics/devguides/collection/gtagjs/ip-anonymization>
- Preferences cookies
- Statistics cookies
- Marketing cookies

For each category the following information shall be included (they shall be automatically defined by Cookiebot scanning the website):

- Name: name of the cookie
- Provider: who is the Company placing the cookie
- Purpose: description of the “reason why” the cookie is placed
- Expiration: when the cookie will expire after its set-up on visitors’ devices
- Type: type of the cookie (e.g. Pixel Tracker, HTTP Cookie, HTML Local Storage)

You are required to publish the cookie policy according to the following structure:

- 1. Premise (standard text, please see below for Italian & English text)**
- 2. Cookiebot table**
- 3. Conclusion (standard text, please see below for Italian & English text)**

Please consider that this document shall be published on the website in a specific and dedicated page and that every other page of the website shall have, in the footer, a link to this page.

Premise

ITA	ENG
Introduzione Per far funzionare correttamente il sito web e per fornire i prodotti e i servizi più rilevanti ai visitatori e ai membri del nostro sito, collochiamo sul vostro dispositivo piccoli file di dati chiamati cookie. Questa informativa fornisce informazioni sui cookie presenti all'interno del sito web e su come gestirne l'interazione.	Introduction To make this website work properly, and to provide the most relevant products and services to our site visitors and members, we place small data files called cookies on your device. This policy provides you with information about cookies and how to control them for this website.
	What is a cookie?

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<p>Che cos'è un Cookie? Un cookie è un piccolo file di testo che un sito web salva sul vostro computer o dispositivo mobile quando visitate il sito web. I cookie vengono quindi inviati di nuovo al sito web di origine ad ogni visita successiva, o ad un altro sito web che riconosce il cookie, per sviluppare una registrazione dell'attività online dell'utente. I cookie di questo sito possono essere definiti come cookie di prima parte (impostati dal nostro sito web) o di terze parti (impostato da un altro sito web) e inoltre possono anche essere contenuti nelle e-mail che ricevete da noi.</p> <p>Cookie analitici Utilizziamo i cookie analitici per creare report aggregati sulle interazioni dei visitatori con il nostro sito web. I report includono informazioni relative al tempo trascorso sui siti web e l'area geografica da cui l'utente è collegato. Utilizziamo tali informazioni per ottimizzare il nostro sito web e offrire all'utente la migliore esperienza possibile. Impostiamo tali funzioni di analisi per rendere anonimo l'indirizzo IP dell'utente. In questo caso, non trattiamo dati personali. Infatti, l'indirizzo IP completo non viene mai scritto né memorizzato da un sistema. Ad esempio, se il vostro IP è 12.428.58.394, la tecnologia cancella gli ultimi tre numeri. In questo modo, non siamo in grado di associare un IP come 12.428.58.0 ad un individuo. Nel caso in cui tali funzionalità di analisi si basino sull'elaborazione del vostro indirizzo IP completo (Internet Protocol), chiediamo il vostro consenso per l'elaborazione di tali informazioni.</p>	<p>A cookie is a small text file that a website saves on your computer or mobile device when you visit the website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie, to develop a record of the user's online activity. Cookies on this site may be delivered in a first-party (set by our website) or third-party (set by another website) context and may also be set in association with emails you receive from us.</p> <p>Analytics cookies We use analytics cookies to make aggregated reports on visitor interactions with our website. The reports include information regarding the time spent on the websites and the geographic area from which the user is connected. We use such information to optimize our website and offer the best user experience. We set such analytics features to anonymize your IP address. In that case, we don't process a personal information. In fact, the full IP address is never written nor memorized by a system. For instance, if your IP is 12.428.58.394, the technology promptly erases the last three numbers. In such way, we are not able to link an IP like 12.428.58.0 to an individual. Where such analytics technologies are based on the processing of your entire Internet Protocol (IP) address, we ask for your consent to process such information.</p>
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Cookiebot table

It will be automatically produced by Cookiebot. An example is reported in the following page. For the page to work correctly, you need to integrate the Cookiebot script, replacing {COOKIEBOT_ID} with the ID provided by Campari in this document.

```
<script id="CookieDeclaration text-uppercase"  
src="https://consent.cookiebot.com/{COOKIEBOT_ID}/cd.js" type="text/javascript"  
async></script>
```

Please verify that for third parties' cookies a link to the third-party privacy policy is included in the name (referring to the example, when the column Provider is highlighted it means it has a direct link to the third-party privacy policy).

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Your consent applies to the following domains: aperol.com

Your current state: Use necessary cookies only.

Your consent ID: a812hNUC-MpaFyu3CHWw4dqK5kmP4vraJusm6mX+P6cCKPgG6qQ2--
 Consent date: Wednesday, March 4, 2020, 03:52:22 PM GMT+1

[Change your consent](#)

Cookie declaration last updated on 2/21/20 by [Cookiebot](#)

Name	Provider	Purpose	Expiry	Type
._f6cp-5022	aperol.com	Pending	1 year	HTTP Cookie
CookieConsent	Cookiebot	Stores the user's cookie consent state for the current domain	1 year	HTTP Cookie
f6cmp_agegate_age_selected	aperol.com	Stores the age of the user.	Session	HTTP Cookie

Name	Provider	Purpose	Expiry	Type
._ga	Google Tag Manager	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years	HTTP Cookie
._gat	Google Tag Manager	Used by Google Analytics to throttle request rate	1 day	HTTP Cookie
._gid	Google Tag Manager	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	1 day	HTTP Cookie
collect	Google	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Session	Pixel Tracker

Name	Provider	Purpose	Expiry	Type
._fbp	Google Tag Manager	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	3 months	HTTP Cookie
._gcl_au	Google Tag Manager	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.	3 months	HTTP Cookie
fr	Facebook	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	3 months	HTTP Cookie
GPS	aperol.com	Registers a unique ID on mobile devices to enable tracking based on geographical GPS location.	1 day	HTTP Cookie
IDE	aperol.com	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	1 year	HTTP Cookie
test_cookie	aperol.com	Used to check if the user's browser supports cookies.	1 day	HTTP Cookie
tr	Facebook	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	Session	Pixel Tracker
VISITOR_INFO_LIVE	aperol.com	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.	180 days	HTTP Cookie
YSC	aperol.com	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session	HTTP Cookie
ytremote-cast-installed	YouTube	Stores the user's video player preferences using embedded YouTube video	Session	HTML Local Storage
ytremote-connected-devices	YouTube	Stores the user's video player preferences using embedded YouTube video	Persistent	HTML Local Storage
ytremote-device-id	YouTube	Stores the user's video player preferences using embedded YouTube video	Persistent	HTML Local Storage
ytremote-fast-check-period	YouTube	Stores the user's video player preferences using embedded YouTube video	Session	HTML Local Storage
ytremote-session-app	YouTube	Stores the user's video player preferences using embedded YouTube video	Session	HTML Local Storage
ytremote-session-name	YouTube	Stores the user's video player preferences using embedded YouTube video	Session	HTML Local Storage

EXAMPLE

Conclusion – hyperlinks to be maintained in the cookie notice published on the website!

ITA	ENG
Come controllare e cancellare i cookie	How to control and delete cookies
<p>Consenso Se il sito web utilizza cookie di analisi e/o di marketing, nella home page può essere visualizzato un banner per la gestione dei cookie. Tale strumento, ove presente, può essere utilizzato per personalizzare le preferenze dei cookie. Lo strumento registrerà quando l'utente ha acconsentito alla nostra cookie policy.</p>	<p>Consent tool Where the website uses analytics and/or marketing cookies, a banner for the cookie management may be displayed in the home page. Such tool, where present, can be utilized to customize your cookie preferences. The tool will record when you have consented to our cookie policy.</p>

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Utilizzo del browser

Molti dei cookie utilizzati sul nostro sito web e tramite e-mail possono essere abilitati o disabilitati tramite il tool di consenso o disabilitando i cookie tramite le impostazioni del vostro browser. Per disabilitare i cookie attraverso il tuo browser, segui le istruzioni che di solito si trovano all'interno del menu "Aiuto", "Strumenti" o "Modifica" del browser. Si prega di notare che la disabilitazione di un cookie o di una categoria di cookie non comporta la cancellazione dei cookie precedentemente registrati dal vostro browser, a meno che l'azione di cancellazione non sia stata completata manualmente attraverso la funzionalità del browser.

In deroga a quanto sopra, l'utente può usufruire del servizio [Your Online Choices](#). Questo servizio permette agli utenti di selezionare le loro preferenze di monitoraggio per la maggior parte degli strumenti pubblicitari. Si raccomanda pertanto agli utenti di sfruttare questa possibilità in aggiunta alle informazioni fornite in questo documento.

Cookie impostati in passato

La raccolta dei vostri dati dai nostri cookie di analisi può essere cancellata. Se i cookie vengono eliminati, le informazioni raccolte prima della modifica delle preferenze possono ancora essere utilizzate. Tuttavia, non useremo più il cookie disabilitato per raccogliere ulteriori informazioni sulla tua esperienza di navigazione. Per i nostri cookie di marketing, quando un utente sceglie di non essere monitorato, viene successivamente inserito un nuovo cookie per impedire agli utenti di essere monitorati.

Domande?

Per ulteriori informazioni, non esitate a contattare il nostro responsabile della protezione dei dati all'indirizzo gdpd.office@campari.com

Using your browser

Many of the cookies used on our website and through emails can be enabled or disabled through our consent tool or by disabling the cookies through your browser. To disable cookies through your browser, follow the instructions usually located within the "Help", "Tools" or "Edit" menus in your browser. Please note that disabling a cookie or category of cookies does not delete the cookie from your browser unless manually completed through your browser function. Notwithstanding the above, the user may take advantage of [Your Online Choices](#). This service allows users to select their tracking preferences for most of the advertising tools. Thus, it is recommended that users make use of this resource in addition to the information provided in this document.

Cookies that have been set in the past

Collection of your data from our analytics cookies can be deleted. If cookies are deleted, the information collected prior to the preference change may still be used, however, we will stop using the disabled cookie to collect any further information from your user experience. For our marketing cookie, when a user opts out of tracking, a new cookie is placed to prevent users from being tracked.

Questions?

For more information, feel free to contact our Data Protection Officer at gdpd.office@campari.com

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1.1.1. Example of cookie policy to be published

A graphical representation of how the cookie policy (composed by the premise, cookiebot table and conclusion) shall look like is reported below:



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1.2. Implementation of the cookie banner – Cookiebot

ACTION REQUIRED:

- **GPDP Office: provision of support for any clarifications needed**
- **Web Agency: Implementation of the Cookie banner leveraging on Cookiebot**

Unless otherwise specified, the boarding of a new site will include the Cookiebot script injected directly using GTM tag. No specific action is needed by the agency.

Cookiebot, after the scanning, shall allow you to publish on the website the cookie banner according to the classification given at paragraph 1.2.

An example is reported below:

This website uses cookies

To make this website work properly, and to provide the most relevant products and services to our site visitors and members, we place small data files called cookies on your device. This policy provides you with information about cookies and how to control them for this website.

[Allow all cookies](#) [Allow selected](#)

Necessary Preferences Analytics Marketing [Hide details](#)

Cookie declaration [About cookies](#)

Necessary (3) These are cookies that are required for the operation of our website and use its features. The information collected relates to the operation of our website (e.g. website scripting language and security tokens) and enables us to provide you with the service you have requested.

Name	Provider	Purpose	Expiry	Type

Preferences (1)

Analytics (6)

Marketing (6)

Unclassified (0)

Cookie declaration last updated on 4/21/2020 by [Cookiebot](#)

The requirements that the banner must ensure are the following:

- it shall ensure that the only cookie category enabled by default is **only** the “Necessary” one.
 - Under this category analytics cookie may be considered only according to par. 1.2
- It must remain active until the user does not close it clicking alternatively on “Allow all cookies” or “Allow selected” (even if the user scrolls the page or surf other website pages):
 - **If the user clicks on “allow all cookies”, all categories shall become active and all cookies must be set-up on visitor device;**
 - **If the users clicks on “allow selected”, only the cookies related to the categories that the visitors have “allowed” (flagging the specific checkbox) must be set-up on the visitor device** (if the user doesn’t allow any other category only “necessary” cookie will be activated);
- it can be re-opened to modify preferences given (please refer to the link “change your consent” as in the cookie notice example above. This shall be automatically made by Cookiebot);
- Colors of the button shall be the following:
 - “Allow all cookies”: RGB 24 – 134 – 0
 - “Allow selected”: RGB 170 – 170 – 170