

## Cookies Policy

(version 2.0 - January 2023)

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

This Internet website (analytics.soccerment.com; hereinafter, the "**Website**") is owned by the company **Soccerment S.r.l.**, having its registered office in Via Pietro Paleocapa 6, 20121 - Milan, Italy, VAT No. and Fiscal Code No. 09992800962 (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 explain 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 "**Regulation**") and Italian Legislative Decree No. 196/2003 (hereinafter, "**Privacy Code**" and, together with the Regulation, "**Applicable Law**").

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 Company 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 Company at any time, using the following methods:

- registered letter with return receipt to the following address Via Pietro Paleocapa 6, 20121 - Milan, Italy;
- by e-mail to the following address [customerservice@soccerment.com](mailto:customerservice@soccerment.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**).

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 tools

#### B.1. 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
Autentication	technical first party cookie - necessary	Allows authentication to be maintained while browsing within the portal.
landing_page	- technical first party cookie - functionality - persistent	Tracks landing pages
_orig_referrer	- technical first party cookie - functionality - persistent	Tracks landing pages
elementor	technical third parties cookie - necessary	This cookie is used by the WordPress theme of the website. It allows the website owner to implement or modify the website content in real time.
secure_customer_sig	technical third parties cookie - necessary - persistent	hopify sets this cookie to store the customer's login.
_iub_cs-*	technical third parties cookie - functionality	Store cookie preference
UserMatchHistory	technical third parties cookie - functionality - persistent	LinkedIn sets this cookie to synchronize the LinkedIn ads ID.
lang	technical third parties cookie - functionality - session	LinkedIn sets this cookie to store the language setting.
bcookie	technical third parties cookie - functionality - persistent	LinkedIn sets this cookie from LinkedIn's share buttons and ad tags to recognize the browser ID.
lidc	technical third parties cookie - functionality - persistent	LinkedIn sets the lidc cookie to facilitate data center selection.
li_gc	technical third parties cookie - functionality - persistent	LinkedIn sets this cookie to store the visitor's consent regarding the use of cookies for non-essential purposes.

cart_*	technical third parties cookie - functionality - persistent	Cookie used to connect with the shopping cart
_pay_session	technical third parties cookie - functionality - persistent	Shopify uses this cookie to ensure a secure connection during checkout and payment of the products.

## B.2. Saving User Preferences

As provided by the Applicable Law, your prior consent is not required for the installation of technical cookies, as referred to in paragraph B.1 above. You are free to block the installation of technical cookies by modifying the settings of your browser (read paragraph E, no. 1 to find out how to do this). However, please note that by blocking the installation of technical cookies, or subsequently deleting them, your ability to access the Website, to use all or part of it, to enable or disable certain functions or to receive certain services may be totally or partially compromised.

On the contrary, your prior consent is required for the installation of cookies and/or other tracking tools other than technical ones (such as, for example, profiling cookies). For this reason, when you access the Website, a *cookie banner* is displayed prominently, informing you that subject to your consent, non-technical cookies are used on the Website and that by pressing the appropriate button provided therein, you will be able to consent to the use of cookies.

Should you give your consent to the installation of cookies in this way, we will keep track of your consent by means of a technical cookie or other technical means linked to the use of the cookie banner, which allow us to keep up-to-date records of your choices. In the latter case, the Company may process, for this purpose, metadata relating to the granular choices made by the User: the possible expression of consent, the details of the granular purposes for which the User has given consent, as well as the possible choice of the User to continue browsing by maintaining the default settings by pressing the relevant button provided by the cookie banner.

In this way, We will ensure that you do not see the cookie banner during your subsequent visits to the Website and we will keep track of your choices in line with the requirements of Applicable Law.

Please note that, if the Company uses a technical cookie or other means in order to demonstrate that it has obtained your consent and to keep a record of your choices up to date at all times, and you delete this technical cookie or other tool used for this purpose from your browser in the manner set out in paragraph E, no. 1 below, the record of your consent may be lost and, therefore, during your next visit to the Website the cookie banner may be displayed again.

## 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.

Third-party analytics cookies are installed on the Website only with your prior consent:

Cookie's denomination	Cookie's category	Link to the policy / opt-out instructions
Google Analytics	- analytics cookie - persistent - collected data by the Company as data controller	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> (informative page)  <a href="https://tools.google.com/dlpage/gaoptout?hl=it">https://tools.google.com/dlpage/gaoptout?hl=it</a> (opt-out): Google Analytics supports an optional browser add-on which, once installed and activated, disables measurement by Google Analytics. Note that this add-on only disables Google Analytics measurement.
Shopify	- analytics cookie - persistent - collected data by the Company as data controller	<a href="https://www.shopify.com/legal/cookies">https://www.shopify.com/legal/cookies</a> (section “Merchant storefronts”- cookie “Reporting and Analytics”)
LinkedIn	- analytics cookie - persistent - collected data by the Company as data controller	<a href="https://www.linkedin.com/legal/cookie-policy?trk=content_footer-cookie-policy">https://www.linkedin.com/legal/cookie-policy?trk=content_footer-cookie-policy</a>

Youtube	- analytics cookie - persistent - collected data by the Company as data controller	<a href="https://policies.google.com/technologies/cookies?hl=en-GB">https://policies.google.com/technologies/cookies?hl=en-GB</a>
Microsoft Clarity	- analytics cookie - persistent - collected data by the Company as data controller	<a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a> <a href="https://privacy.microsoft.com/en-us/privacystatement#maincookieessimilartechnologiesmodule">https://privacy.microsoft.com/en-us/privacystatement#maincookieessimilartechnologiesmodule</a>

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. Profiling cookies

The profiling cookies are used to create a user's profile, based on the preferences and likings showed by You during the navigation on Internet and to make You display advertisings consistent with your profile. In such way, the advertisings that You will display on our Website could be more of interest for You.

You are clearly free to block the installation of profiling 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. In the event that you decide to deactivate the behavioural advertising, this does not mean that you will not receive advertisings on the Website. However, the banners that you will display on the Website could not reflect your interests or your preferences on the browser you are actually using.

##### D.1. Third parties profiling cookie

In addition, other profiling cookies are installed on the Website by third parties (third-party cookies). Here is a list of the third-party profiling cookies currently used on the Website, with an indication of the *links* to the information pages created by their developers (also containing information on how to oppose their installation, so-called *opt-out*, and on the relative retention periods):

Cookie's denomination	Cookie's category	Link to the policy
Meta buttons and widgets (Facebook)	- third party profiling cookie - persistent	<a href="https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&amp;entry=0">https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&amp;entry=0</a>
Google buttons and widgets	- third party profiling cookie - persistent	<a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>
LinkedIn buttons and widgets	- third party profiling cookie - persistent	<a href="https://www.linkedin.com/legal/privacy-policy?">https://www.linkedin.com/legal/privacy-policy?</a>
Widget Shopify	- third party profiling cookie - persistent	<a href="https://www.shopify.com/legal/cookies">https://www.shopify.com/legal/cookies</a>
Hotjar	- third party profiling cookie - persistent	<a href="https://www.hotjar.com/legal/policies/privacy/">https://www.hotjar.com/legal/policies/privacy/</a>

#### E. 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:** <http://windows.microsoft.com/it-it/windows-vista/block-or-allow-cookies>
- **Chrome:** [https://support.google.com/chrome/answer/95647?hl=it&p=cpn\\_cookies](https://support.google.com/chrome/answer/95647?hl=it&p=cpn_cookies)
- **Firefox:** <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>

- **Safari:** <https://support.apple.com/it-it/guide/safari/manage-cookies-and-website-data-sfri11471/>
- **Opera:** <https://help.opera.com/en/latest/web-preferences/>

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 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.

## **(3) Use the Internet website Internet [www.youronlinechoices.eu/it/](http://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/](http://www.youronlinechoices.eu/it/), providing information on the behavioural advertisements 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 indicated in the introduction to this cookie policy, it is possible that the Company collects and processes some of your personal data through cookies that it places directly on the Website or cookies placed by third parties who act on behalf of the Company on the basis of a specific deed of appointment as data controller pursuant to Article 28 of the Regulation (first party cookies). The Company acts as the data controller of this data, in accordance with the provisions of the Applicable Law. We will process your data only by IT means, in a fully automated manner and without human intermediation. Therefore, our employees will never access the content of your personal data obtained through cookies, which means that they will never be able to access and/or have PII (Personally Identifiable Information), i.e. information from which you can be directly identified.

Some of our employees, appointed by us as persons in charge of the processing, in accordance with Article 29 of the Regulations, may carry out maintenance work on the computer systems that house your data, without ever being able to access their actual content.

Personal data may be stored on *servers* managed by third parties (e.g., suppliers of IT systems) or may be managed by subjects specialised in online advertising, who act as data processors, pursuant to Article 28 of the Regulations, on the basis of a specific appointment in writing by the Company. Your personal data will not be disclosed to third party data controllers or disseminated.

Your personal data, collected by the Company by means of the technical cookies referred to in paragraph B above, will be stored for the time strictly necessary to carry out the primary purposes described in this policy, or in any case as necessary to protect the rights and interests of both Users and the Company.

As regards the duration of the cookies themselves, including third-party cookies, and the retention periods of the data collected by the third parties, please refer to the tables included in this policy.

## G. Transfer of personal data to a third country

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 Area (EEA) that could not guarantee a level of privacy and personal data protection equal to the level of protection guaranteed by the Applicable Law, but as Data Controller we take the utmost account of the right to security, therefore we will process such transfers with all due care and guarantees and, therefore, we will handle such transfers with all due care and guarantees in accordance with the Applicable Law and, in particular, in accordance with articles 45 (Transfer on the basis of an adequacy decision) and 46 (Transfer subject to adequate safeguards) of the Regulation.

Specifically, for the provision of the Google Analytics service (referred to in paragraph C above), the supplier of the Company, Google Ireland Limited, may transfer pseudonymous personal data of the Users outside the EEA, under the Standard Contractual Clauses and, in particular, towards the United States, adopting for this purpose additional measures to ensure that the transfer takes place in compliance with the Regulation itself. More information about the additional security measures applied by Google Ireland Limited for transfers of personal data outside the European Union can be found in the following resources made available by the provider itself: “*Regarding international data transfers in Google Analytics*” (available at <https://support.google.com/analytics/answer/11609059>) and “*Safeguards for international data transfers with Google’s advertising and analytics products*” (available at [https://services.google.com/fh/files/misc/safeguards\\_for\\_international\\_data\\_transfers.pdf](https://services.google.com/fh/files/misc/safeguards_for_international_data_transfers.pdf)). In consideration of the scope of the processing, the nature of the data processed and the risks of the processing, the Company has deemed suitable the additional security measures that the supplier guarantees to adopt for the protection of personal data processed on behalf of the Company itself.

We would like to point out that some of the third parties indicated in the tables in this cookie policy may - as independent data controllers - process personal data collected by means of the cookies installed on this Website from a location outside the European territory and, therefore, we recommend that you read their privacy policy carefully above for further details.

## H. 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:

- registered letter with return receipt to the following address Via Pietro Paleocapa 6, 20121 - Milan, Italy;
- by e-mail to the following address [customerservice@soccerment.com](mailto:customerservice@soccerment.com)

Pursuant to Applicable Law, the Users have:

- a) the right to **withdraw consent at any time**, if the processing is based on their consent;
- b) the right of **access** to the personal data;
- c) (if it 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 restriction of the processing of personal data**, the **right to rectification** and the **right to erasure** (“right to be forgotten”);
- d) the **right to object**:
  - 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;
- e) if they believe that the processing that concerns them violates the Regulation, 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 Venezia n. 11, 00187 - Rome (<http://www.garanteprivacy.it/>).

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The Company 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.