

COOKIE POLICY

This page describes the methods and purposes of the processing, carried out through cookies, of the personal data of users (hereinafter the "Users or the "Data Subjects") who consult the site <https://www.faiadvisory.it/en/> (the "Site").

For further information on the other processing of personal data processed through the Website, please refer to the Website's Privacy Policy accessible at the following link: <https://www.iubenda.com/privacy-policy/61114313/legal>.

1. Data Controller's contact details

The Data Controller of the processing is Futuro all'Impresa Srl, VAT no.: 03069860983, with registered office in MILAN, VIA MONTENAPOLEONE 14, tel. +39 02 3594 1127, e-mail address info@faigroup.eu (the "Controller").

2. What are cookies?

2.1 Cookies are small text files that websites visited by users send to their terminals, where they are stored in order to be retransmitted to the same sites on subsequent visits and are generally used for different purposes: performing computer authentication, session monitoring, storing information on specific user configurations, storing preferences, etc.

2.2 Based on the website or domain that installs the cookies, they can be distinguished into:

- α) owner cookies: installed on the user's terminal directly by the owner or operator of the website that the User is visiting;
- β) third-party cookies: installed through the site the User is visiting by holders of different sites or web servers.

2.3 Based on how long cookies are valid, they can be subdivided into:

- α) session cookies: these are stored temporarily in the user's terminal until the end of the browser session. These cookies are usually necessary for the proper functioning of the applications and functionalities of the site;
- β) persistent cookies: these remain stored on the user's terminal equipment for a longer period of time than the individual browsing session, depending on their function and the user's choices regarding them. Persistent cookies allow information to be transferred back to the web server each time the website is accessed.

2.4 Based on the purposes pursued, cookies can be included into two general categories:

- α) "technical" cookies, which, being strictly necessary to provide a service requested by the user, do not require the user's consent, and in the absence of which certain operations could not be carried out or would be more complex and/or less safe; for this reason they are automatically installed following access to the website; they include (i) browsing cookies that ensure normal surfing and use of the website (allowing, for example, to make a purchase or to authenticate to access restricted areas), (ii) functionality cookies (which allow the user to navigate according to a set of selected criteria such as language);
- β) "profiling" cookies, used to refer specific actions or behavioral patterns recurring in the use of the offered functionalities (pattern) to specific identified or identifiable subjects, in order to group the different profiles within homogeneous clusters of different sizes, so that the holder can, among other things, also modulate the provision of the service in an increasingly customized manner beyond what is strictly necessary for the provision of the service, as well as send targeted

advertising messages, i.e. in line with the preferences expressed by the user while surfing the web; this category also includes c. so-called "social cookies", i.e. cookies from social networks, used in accordance with the policies of the relevant social network, as well as so-called. "analytical cookies" - which are used to analyses access and visits to the site itself and to allow the owner to improve its structure, navigation logic and contents, to assess the effectiveness of a service provided or to help measure "traffic", i.e. the number of visitors, also possibly broken down by geographical area, time slot of the connection or other characteristics - unless they can be assimilated to technical cookies, which is possible only where (i) the use of analytical cookies is limited solely to the production of aggregate statistics and that they are used in relation to a single site or a single mobile application in such a way as not to allow the tracking of the navigation of the person using different applications or browsing different websites (ii) they are implemented and used directly by the first party site or, if of third party, appropriate means are adopted to reduce the power of identification (by masking significant portions of the IP address), and (iii) contractual obligations are in place between the sites and third parties which expressly mention the third party's commitment to use them exclusively for the provision of the service, to store them separately and not to "enrich" them or "cross-reference" them with other information they possess, or to transmit them to other third parties. As they are not strictly necessary for the functioning of the website, profiling cookies require the users' consent for their installation.

3. Cookies used on the Controller's Site.

3.1 The Website uses the following technical cookies which, being strictly necessary, cannot be disabled via the "manage options" tool. For each of the technical cookies listed, in addition to their specific function, the period of validity of the cookies and the source are indicated:

| COOKIE NAME | SOURCE | FUNCTION | DURATION |
|--------------------------|--------|---|------------------|
| wp-wpml_current_language | WPML | Cookie essential for registering the choice of language | session duration |
| _cookie_privacy_accepted | Owner | Record your cookie acceptance preferences. | 182 days |

3.2 The Website also uses the following profiling cookies, namely, third-party 'analytical cookies'.

The Controller has no control over the process used by third party sites to collect information on navigation on the Site, linked to the personal data they hold. We therefore invite you to consult the privacy policies of the third parties, whose links are indicated in the table below, to find out the purposes of use, including advertising, of the information they may collect. These policies should also enable you to exercise your consent choices with these third parties through the means made available by them.

For each of the cookies listed in the table below, in addition to their specific function, the period of validity of the cookies and the respective proprietary or third-party source is indicated; there is also a link to the privacy policy and consent form of the respective third-party website where you can make any choices in this regard.

Analytical cookies:

| COOKIE NAME | SOURCE | FUNCTION | DURATION | DISCLOSURES AND CONSENTS |
|-------------|-------------------------------------|---|----------|---|
| _ga | Third-party: Google Analytics | Analytics: They allow you to monitor and analyze traffic data and serve to keep track of User behavior in order to improve user experience. | 1 year | https://policies.google.com/privacy?hl=it |
| _ga_* | Third-party: Google Analytics | Analytics: Used to maintain session status, archive and count page views | 1 year | https://policies.google.com/privacy?hl=it |
| _gid | Third-party: Google Analytics | To store and count page views. | 1 day | https://policies.google.com/privacy?hl=it |
| _gat | Third-party: Google Analytics | Analytics: Used to read and filter requests from bots and accelerate the frequency of requests. | 1 minute | https://policies.google.com/privacy?hl=it |

4. Acceptance of the use of cookies

4.1 When first accessing any page of the Website, there is a banner containing a short information notice containing a link to this Information Notice, the "Accept" button to be clicked if the User wishes to give consent to the installation of all cookies other than technical cookies, as well as the "Manage Cookies" button that allows the user, through a special tool, to accept (or, subsequently, deny) consent, to all or - also separately, by moving the relevant sliders - to the various functionalities, third parties and categories of non-technical cookies. However, it is not possible to disable technical cookies as they are strictly necessary for the functioning of the site. In the top right-hand corner of the banner there will also be a command marked with a cross, the selection of which will result in the default settings remaining in place so that no non-technical cookies are installed, and therefore the continuation of browsing in the absence of cookies other than technical ones.

4.2 Closing the banner by clicking on the cross at the top right of the banner, scrolling down the page or clicking anywhere on the page of the Site outside the banner itself does not amount to consent to the use of cookies other than technical cookies.

4.3 The user may at any time access the "Manage Cookies" tool to revoke/change the consent given by clicking on the button in the footer of any page on the site.

4.4 The Controller uses a technical cookie to store user preferences related to cookies.

4.5 Through the options provided by your browser you can always set your browser so that cookies are stored on your device or can be rejected, e.g. by default or by their owners. Each browser has a different way of enabling cookie management and choices, as described on the information pages of each browser. You can disable cookies by following the instructions provided by the main browsers at the following links:

- Google Chrome:
<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=it>
- Apple Safari:
<https://support.apple.com/it-it/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Mozilla Firefox:
<https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Opera:
<https://help.opera.com/en/latest/web-preferences/#cookies>
- Microsoft Edge:
<https://support.microsoft.com/it-it/microsoft-edge/eliminare-i-cookie-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>
- Microsoft Internet Explorer:
<https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>

Please note that if you decide to disable even technical cookies via the functions provided directly by your browser, you may lose many of the functionalities of the website and some services may not work, as they should.

4.6 Further information is available at <http://www.youronlinechoices.com/it/le-tue-scelte/>, which brings together digital advertising professionals in the European Digital Advertising Alliance (EDAA). The member companies on this platform allow the user to reject or accept through it the cookies they use to adapt the ads that may be displayed on their device to information about their browsing behaviour.

5. Purpose and legal basis of personal data processing

5.1 The data collected through technical cookies will be processed for the purposes described above in point 2.4 lett. a) with the functionalities described in the table in section 3.1, therefore exclusively to allow the user to correctly use all the functionalities of the Site and the requested services; therefore, on the legal basis of the execution of a pre-contractual request or contractual execution.

5.2 Data from profiling cookies are used for the purposes described above under point 2.4 letter b) with the functionalities described in the tables under point 3.2, only in the presence of the user's consent, which constitutes the legal basis for the relevant processing.

6. Nature of data provision

6.1 Technical cookies are necessary to allow the User to use its features and services; therefore, they are not subject to prior consent and cannot be disabled.

6.2 Conversely, profiling cookies are not strictly necessary to use the Website and their installation is subject to the User's consent. Failure to consent to this type of cookie will not prevent navigation and use of the Website in any case.

7. Processing methods

Users' personal data are processed with electronic and IT tools for the time strictly necessary to achieve the aforementioned purposes for which they were collected. They are processed in compliance with the applicable legislation, adopting the appropriate and most adequate security measures aimed at preventing unauthorized access, disclosure, modification or unauthorized destruction.

8. Data recipients

8.1 The Users' personal data will be processed by employees or collaborators, trained on the processing, of the Data Controller and of the other subjects responsible for the processing (companies providing assistance/services, consultancy, data processing and other IT services), as well as, on the basis of the consent eventually given by the User, by the third parties indicated in the tables referred to in point 3 above.

8.2 Users' personal data may also be shared with other third parties where necessarily required by legal obligation and/or following a binding judicial or administrative decision.

9. Period of data retention

Cookies remain stored in the User's terminal for the duration indicated in the tables in points 3.1 and 3.2 above.

10. User rights

10.1 As an interested party, you are entitled to the rights provided for by the articles vis-à-vis the Data Controller. 12 and following. of EU Reg. 679/2016 (the "GDPR"), including the right of access to personal data and therefore you will be able, among other things, to obtain confirmation as to whether or not a treatment has taken place that concerns you. It will be your right to request, in accordance with the law, the rectification or cancellation of data or the limitation, in view of the protection of your rights, of the treatment that concerns you, oppose the treatment itself, as well as revoke any consent given through the tool " Manage cookies" indicated in point 4.3 above. Furthermore, you have the right to obtain the release

in electronic format, to you or to another person indicated by you, of the personal data you have provided to us.

10.2 You can exercise these rights by sending a request to the following e-mail address: roma@nmlex.it

10.3 You also have the right to lodge a complaint with the Guarantor for the Protection of Personal Data (www.garanteprivacy.it) if you believe that the processing that concerns you violates the applicable legislation.

11. Changes to this Statement

It may sometimes be necessary to make changes to this information due to changes in the law or to keep up with new technological developments. The Owner reserves the right to make such changes which will be communicated via pop-up on the screen when the Site is opened or by other appropriate methods.