



## COOKIE POLICY

On the sites and app of the data controller UCapital24 S.p.a. Cookies are used to make users's online browsing simpler, faster and more interactive. This information describes the cookies used and how to activate and deactivate the cookies provided.

This policy must be consulted together with the Privacy Policy of UCapital24 and of which it constitutes an integral part, made available on the sites <https://ucapital24.com> <https://marketintelligence.ucapital24.com> <https://ucapitalintelligence.com> <https://sharks.ucapital.com> and within the UCapital App.

### 1. What are cookies:

Cookies are small text files that the sites visited send to the User's terminal, where they are stored, and then re-transmitted to the same sites on the next visit. Cookies allow sites to function correctly and efficiently to improve the user experience, allowing the relevant site from time to time to store information in the memory of the computer or other devices. Thanks to cookies it is therefore possible to collect information regarding Users's online browsing and use them to facilitate or personalize the browsing experience.

### 2. Classification of cookies:

Cookies can be classified in different ways: depending on the site that generates them, depending on their duration and depending on their purpose of use.

- *Classification of cookies depending on the site that generates them:*
  - First Party Cookies: they are generated by the site the User is visiting and only that site can read this data.
  - Third Party Cookies: they are generated by other sites, outside of the one the User is visiting. When the User visits a page on a site, he may encounter content inserted by external sites such as Facebook, Twitter, You Tube, Vimeo or others, and these sites may generate cookies. The site covered by this policy has no control over them. Users are asked to check these sites and their Privacy Policies.
- *Classification of cookies according to their duration:*
  - Temporary (or session) cookies: they do not have an expiry date, and are deleted as soon as the browsing session ends or the browser is closed.
  - Persistent cookies: they have an expiry date and remain on the computer even when the browsing session ends or after closing the browser. They can be read by the site that created them on subsequent visits to the same site.
- *Classification of cookies according to their purposes of use:*
  - Technical cookies
  - Profiling cookies
  - Analysis cookies

In detail, combining the classifications we have:

- First-party Technical Cookies: This type of cookie allows the correct functioning of some sections of the Site. They are of two categories, temporary (or session) and persistent (see above). These cookies are necessary to correctly view the site and in relation to the technical services offered, they will therefore always be used and sent, unless the visitor changes the browser settings (with the possibility, however, of not making the most of or making some services unusable). Technical cookies are those used for example to authenticate, to use multimedia content such as flash players or to allow the choice of navigation language. In general, it is not necessary to obtain the User's prior and informed consent. The legal basis that allows their use is the legitimate interest of the Data Controller in the regular functioning of the website. Furthermore, analytical cookies through which the Data Controller becomes aware exclusively of statistical information, collected in aggregate form, relating to the number of visitors and how they use the website are also assimilated to technical cookies. If the information is not collected in aggregate form and instead includes identifying data (for example, the IP address used by the non-anonymized user's device), the cookies used to collect this additional data will be qualified as "profiling cookies", active only with the user's consent.
- Technical Cookies to integrate third-party functions: This type of cookie integrates functions developed by third parties within the site pages such as icons and preferences expressed in social networks for the purpose of sharing site contents or for the use of services third-party software (such as map generation software and other software that offers additional services). These cookies are sent from third-party domains and partner sites that offer their functionality on the site's pages.
- Analysis cookies of third-party services: These cookies are used to collect information on the use of the site by Users: pages visited, time spent on the site, origins of the traffic of origin, geographical origin, age, gender and interests for the purposes of marketing campaigns. These cookies are sent from third-party domains external to the site and according to current legislation they can be assimilated to technical cookies "if tools are adopted that reduce the identification power and the third party does not cross-reference the information collected with other information it already has", otherwise they are assimilated to profiling cookies.
- Profiling cookies: These are those cookies necessary to create user profiles in order to send advertising messages in line with the preferences expressed by the user within the pages of the site. This type of cookie is currently not operational within the Sites and apps in question.
- social widgets and plugins: some widgets and plugins made available by social networks may use their own cookies to facilitate interaction with the reference site;

**Technical cookies** do not require the acquisition of a prior and informed consent from the User for their enabling. The legal basis that allows their use is the legitimate interest of the Owner in the regular functioning of the websites and apps.

As regards **non-technical cookies**, the User will be asked for prior consent upon first access, by selecting the settings from the cookie banner. Without this consent, cookies cannot be enabled on the User's device, who can manage his preferences at any time. Any consent given to the use of cookies is valid for 6 months, after which the cookie banner will be shown again to renew your preferences.

### **3. List of cookies used on the sites and apps covered by this policy which require prior consent from the User to enable them.**

Consent is required for the following cookies, without which they will not be enabled on Users' devices. For each of them the following data is reported: source, cookie name, type, duration and purpose.

Source	Cookie's Name	Type of Cookie	Duration	Purpose
<a href="https://marktintelligence.ucapital24.com/">https://marktintelligence.ucapital24.com/</a>	_ga_0LV6GXQSQY	Third-party-Analytics	1 year 1 month	This cookie is used by Google Analytics to persist session state
<a href="https://marktintelligence.ucapital24.com/">https://marktintelligence.ucapital24.com/</a>	_ga	Third-party	1 year 1 month	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.
<a href="https://ucapital24.com/">https://ucapital24.com/</a>	_ga	Third-party	1 year 1 month	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports
<a href="https://ucapital24.com/">https://ucapital24.com/</a>	_ga_380KZ6JM5L	Third-party	1 year 1 month	This cookie is used by Google Analytics to persist session state.
<a href="https://ucapital24.com/">https://ucapital24.com/</a>	_ga_0LV6GXQSQY	Third-party	1 year 1 month	This cookie is used by Google Analytics to persist session state.
<a href="https://ucapital24.com/">https://ucapital24.com/</a>	bx_user_id	Third-party	1 year 1 month	Used to identify user on the website for the LiveChat.

<a href="https://ucapital24.com/">https://ucapital24.com/</a>	ossn_restricted_url_visited	First-party	2 minutes	-
<a href="https://shares.ucapital.com/">https://shares.ucapital.com/</a>	_ga	Third-party	1 year 1 month	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports

#### 4. How to disable cookies via browser configuration:

In general, cookies can be disabled by the User by checking and/or modifying the settings of their browser based on the instructions made available by the respective providers at the links indicated below:

Microsoft Edge

Mozilla Firefox

Google Chrome

Apple Safari

Opera

More information on cookies is available at <http://www.youronlinechoices.com/it>.

#### 5. How to contact the Data Controller and the Data Protection Officer:

In relation to the personal data collected object of this Cookie Policy, the Data Controller is UCapital24 S.p.A., with registered office in Via dei Piatti 11, 20123, Milan (MI), C.F. and VAT number 10144280962, e-mail [privacy@ucapital24.com](mailto:privacy@ucapital24.com) . The updated list of data controllers is available, upon request, at the Data Controller's headquarters.

The owner has appointed a personal data protection officer who can be contacted by writing to [dpo@ucapital24.com](mailto:dpo@ucapital24.com) .

#### 6. Recipients of data and transfer of data outside the European Union:

The information collected through cookies will be communicated to:

- employees and/or collaborators in any capacity of the Data Controller duly authorized and trained in compliance with the provisions of the GDPR;

- suppliers and consultants, subject to the stipulation of an appointment contract as data processor or a joint Data Controller contract.

In some cases, the data could also be transferred outside the European Union to countries that adopt a level of data protection similar to the European one (and therefore recipients of "adequacy decisions") or upon stipulation of the "Standard Contractual Clauses" adopted by the European Commission with decision 2021/914 and aimed at subjecting the transfer to adequate protection guarantees.

In this last regard, please note that the sites and apps covered by this information currently use **analysis cookies** from Google Ireland Ltd. Any transfers of data to the United States benefit from the legal basis set out in art. 45 of the GDPR, having entered into force in July 2023 an adequacy decision towards the United States which provides for the possibility of transferring data to US companies that have undergone the required certification mechanisms. Google holds all the required and necessary certifications to be able to transfer data in compliance with applicable legislation. Finally, it is specified, as has already been widely indicated, that these cookies will be subject to consent by the Users.

## 7. What are the rights of Users:

Interested parties can exercise the rights that the GDPR guarantees, referred to in the articles. 7, c. 3, and from 15 et seq., by sending an email to the address [privacy@ucapital24.com](mailto:privacy@ucapital24.com), or, alternatively, a communication by registered mail with return receipt to the UCapital24 headquarters at the address Via dei Piatti 11, 20123 , Milan (MI).

In particular, the interested party may exercise the following rights:

- **Right of access:** obtain confirmation of the existence or otherwise of processing of personal data concerning him and the purposes of such processing, to obtain a copy of the data and information on: the origin of the data, the categories of data processed, the recipients of the data, the purposes of processing, the existence of an automated decision-making process (including profiling), the data retention period and the rights provided by the GDPR;
- **Right to obtain rectification** of inaccurate personal data and integration of incomplete personal data;
- **Right to obtain the deletion of personal data**, if one of the conditions set out in the art. 17 of the GDPR, in cases where the data are no longer necessary or the owner no longer has the authorization to process them;
- **Right to obtain the limitation of the processing of personal data**, in the cases provided for by the art. 18 of the GDPR, in the following cases: 1. in the event of a dispute regarding the accuracy of the data, for the time necessary to verify the accuracy; 2. The owner is no longer authorized to process them, it is possible to request the limitation of processing alternatively to cancellation; 3. If the data are no longer necessary for the data controller but are necessary for the interested party for the assessment, exercise or defense of a right in court;
- **Right to data portability**, if the conditions referred to in the art. 20 of the GDPR, i.e. to receive personal data concerning him in a structured, commonly used and machine-readable format and request their transmission to another owner, if technically feasible.
- **Right to withdraw consent**, users can withdraw consent at any time from their cookie settings. For the processing based on it, without prejudice to the lawfulness of the processing based on the consent given before the revocation. Consent can be revoked by accessing the cookie settings.
- **Right to object to processing for the pursuit of the legitimate interest of the Data Controller.** Each interested party has the right to object at any time to the processing of their personal data carried out for the pursuit of a legitimate interest of the Data Controller. In the event of opposition, the personal data will no longer be processed, provided that there are no legitimate reasons to proceed with the processing which prevail over the interests, rights and freedoms of the interested party or for the assessment, exercise or defense of a right in court.

## **8. Changes to this cookie policy:**

This policy may be subject to updates or changes (also due to new laws or regulations) for this reason Users are invited to regularly check this document in order to always remain updated with respect to any changes that have occurred since the last consultation.

**Last revision date: 14/06/2024**