

1. Cookie Policy of www.termogomma.it

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1.1 What cookies and trackers are

This Cookie Policy describes the technologies that allow the Application to store and access information on the user's device (e.g. via cookies or scripts).

For simplicity, all such technologies are referred to as "Trackers", unless otherwise specified. Cookies are browser-based Trackers and can be used in web environments, but not within apps. Some Trackers are managed directly by the Controller (first-party) and others by third parties (third-party).

1.2 Types of Trackers used

The Application uses the following categories of Trackers:

1. Necessary (technical) cookies
 - Cookies and trackers that are essential for the functioning of the website and provision of the service (e.g. session management, security, basic settings).
 - They do not require user consent and are activated on the basis of the Controller's legitimate interest, which is relevant for accessing the service.
2. Experience cookies
 - Trackers aimed at improving user experience and enabling interactions with external content (e.g. Font Awesome, Google Fonts, Google Maps widget).
 - In some cases, they may process identifying data (e.g. IP, online identifiers) and require consent where they are not strictly necessary.
3. Marketing cookies
 - Trackers used to deliver personalised content and ads and to measure their effectiveness.
 - Example: analytics and marketing tools managed by third parties, such as ShinyStat, which may analyse website usage and contribute to the definition of user segments.
 - Use of such Trackers requires the user's explicit consent, separate from consent to browsing data processing, in line with Articles 6 and 9 GDPR.

Third-party Trackers may collect data for purposes of the respective providers; further details are available in the third parties' own privacy policies.

1.3 AI and cookies / trackers

Certain third-party services or technical solutions used by the Controller may incorporate AI-based functions (for example engines analysing browsing patterns or optimising content) that rely on cookies or other identifiers in order to:

- analyse navigation patterns;
- personalise on-site content or suggestions;
- support digital marketing activities.

In these cases, the relevant Trackers may be classified as "experience" or "marketing", and their activation is subject to the user's consent via the cookie preference panel.

The use of AI on browsing data is in all cases carried out in accordance with the principles of minimisation, transparency and privacy by design/by default established by the GDPR. The Controller does not use AI via cookies to generate deepfakes, nor employ AI systems classified as high-risk under the AI Act, unless explicitly communicated in the future.

1.3.1 Trackers managed by third parties

- **Google reCAPTCHA (Google Ireland Limited)**

Google reCAPTCHA is a spam protection service provided by Google Ireland Limited.

Personal Data processed: answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, Trackers and Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

Trackers duration:

- `_GRECAPTCHA`: duration of the session
- `rc::a`: indefinite
- `rc::b`: duration of the session
- `rc::c`: duration of the session
- `rc::f`: indefinite

- **Cloudflare (Cloudflare, Inc.)**

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc. The way Cloudflare is integrated means that it filters all the traffic through this Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

Personal Data processed: Trackers and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Trackers duration:

- `_cfuvid`: indefinite
- `cf_clearance`: 30 minutes

- **Google Fonts (Google Ireland Limited)**

Google Fonts is a typeface visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

- **Google Maps widget (Google Ireland Limited)**

Google Maps is a maps visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

- **Font Awesome (Fonticons, Inc.)**

Font Awesome is a typeface visualisation service provided by Fonticons, Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – [Privacy Policy](#).

- **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google’s official documentation](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

Personal Data processed: number of Users, session statistics, Trackers and Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt out](#).

Trackers duration:

- `_ga`: 2 years
- `_ga_*`: 2 years

- **ShinyStat (ShinyStat S.p.a. (SevenData S.p.a.))**

ShinyStat (ShinyStat Business, ShinyStat Pro or ShinySta ISP) is an analytics service provided by ShinyStat S.p.a. (SevenData S.p.a.).

This analytics service anonymises the User's IP address.

Personal Data processed: Trackers and Usage Data.

Place of processing: Italy – [Privacy Policy](#) – [Opt Out](#).

Trackers duration:

- SN_*: 6 months
- SSA: indefinite
- SSC_*: 6 months
- SSID_*: duration of the session
- SV_*: duration of the session

1.4 Managing consent and preferences

Where the use of Trackers is based on consent, the user may grant or withdraw such consent through the privacy choice interface (banner or cookie preference centre) available on the website.

For third-party Trackers, the user may manage preferences through:

- opt-out links indicated in the third parties' privacy policies;
- the settings of their browser or device;
- relevant advertising self-regulation tools (e.g. YourOnlineChoices, Network Advertising Initiative, Digital Advertising Alliance).

The user may also use their browser settings to:

- view the cookies stored;
- block cookies or similar technologies;
- delete cookies or similar technologies from the browser.

However, such settings generally do not allow granular management by category (necessary, experience, marketing).

Refusal of certain Trackers may reduce the quality of the user experience and the availability of some features.

1.5 AI, marketing and generated content

The Marketing department, supported by AI tools (e.g. Claude and ChatGPT), may use data derived from the website's analytics and marketing tools to:

- understand the effectiveness of campaigns;
- prepare more relevant promotional content;
- generate marketing texts, posts and internal reports.

These activities:

- are based, where possible, on aggregated or pseudonymised data, in accordance with the principle of data minimisation;
- rely on appropriate legal bases (legitimate interest or consent, as applicable);
- do not involve sensitive profiling or deepfake creation and do not use AI systems classified as high-risk.

1.6 Controlling or deleting cookies via device settings

The user can manage cookies through browser settings, following the procedures documented on the websites of the main browsers (Chrome, Firefox, Safari, Internet Explorer, Edge, Brave, Opera).

For mobile apps, the user can manage certain Trackers via device settings (e.g. advertising and tracking settings).

1.7 Opt-out from interest-based advertising

In addition to the options above, the user can refer to initiatives such as YourOnlineChoices (EU), NAI (USA), DAA (USA), DAAC (Canada), DDAI (Japan) to exercise preferences regarding numerous advertising tools.

The AppChoices application of the Digital Advertising Alliance allows management of interest-based advertising on mobile devices.

1.8 Consequences of lack of consent

The user is free to grant or refuse consent to the use of non-necessary Trackers. However, in the absence of consent:

- some website features related to external content, personalisation or advanced analytics may not be available;
- the user experience may be less optimised.

1.9 Data controller and contacts

The data controller for data collected through cookies and other Trackers is ATP S.p.A., VAT No. IT 00551760366, Via Austria 12/14/16, 41122 Modena (MO) – Italy.

Email contact: atp@atpgroup.it.

For additional information on AI use and tracking technologies on the website, users may contact the Controller at the above contact details.

1.10 Updates

This Cookie Policy may be updated to reflect changes in the Trackers used, in the AI use related to web browsing or in applicable legislation. The latest update date is indicated at the bottom of this Policy.