

# Privacy and Cookies Policy

## Privacy

The General Data Protection Regulation (“**GDPR**”), which came into force on 25 May 2018, aims to guarantee that the personal data of physical persons is processed in compliance with the rights, fundamental freedoms and dignity of persons, with particular reference to confidentiality and personal identity. Proxima Srl (“**PROXIMA**”), pay particular attention to the way in which personal information is used and shared and it is therefore important to inform you of the adopted privacy policy.

Processing of personal data means the collection, recording, organisation, conservation, processing, alteration, selection, retrieval, comparison, use, disclosure, erasure, distribution, interconnection and any other processing which is useful for the performance of the specific service requested (the “**Service**”).

### 1. Personal information we collect from users

1.1 PROXIMA collects the personal information provided by users when sending the contact forms on the website [www.pxi.it](http://www.pxi.it) (the “**Website**”) (for example, relating to the "Careers", "Free Demo", “Training and Support” or "Events" sections) and in particular:

- name and job title or contact information including the e-mail address and telephone number;
- personal information such as address, postcode, country, position;
- other information relating to surveys or offers sent to customers.

This information falls under the definition of personal data, i.e. any information concerning an identified or identifiable physical person (the “**Data subject**”); identifiable refers to physical persons who can be identified, directly or indirectly, with particular reference to data such as the name, identification number, data concerning their location, an online ID or one or more characteristic elements of his or her physical, physiological, genetic, mental, economic, cultural or social identity (the “**Personal Data**”).

1.2 The Website uses cookies, as described in more detail here below in the [Cookies Policy](#).

### 2. Purposes of the processing

2.1 The Personal Data provided by you at the time of registering with the Service, or otherwise acquired during the activities performed by us, may be processed, for purposes linked to the provisions of the Service and in particular to respond to requests sent by you to PROXIMA (for example, to send information materials, to be contacts or for a demo or sales offer, etc.). After registration, PROXIMA may send you e-mails relating to similar services to those provided subsequently to your request for the Service. You may object to the sending of e-mails at any time.

2.2 Your Personal data will be used to periodically send promotional e-mails (using the e-mail address provided by you), if you accept this Privacy Policy when submitting the form. These e-mails may concern new products, events, special offers or other information PROXIMA thinks may interest you.

2.3 Your Personal Data may also be used for profiling, through the use of cookies and following acceptance in this sense by you. The acceptance of the use of cookies is given at the start when clicking on “Accept cookies” and closing the banner, as better explained in the [Cookies Policy](#) (here below).

### **3. Methods of processing**

3.1 Your Personal Data are collected by the parties indicated in point 6. and the related processing is done using manual or computerised automated instruments with logics strictly linked to the purposes described above and in any case to guarantee the security and confidentiality of the data.

### **4. Optional nature of the provision of data**

4.1 The provision of Personal Data by you is absolutely optional and does not represent a legal requirement; however, in some cases, the provision of your Personal Data could be required in order to provide the Service you have requested.

4.2 As regards the effects of the non-acceptance or disabling of the cookies, please refer to the terms of the [Cookies Policy](#) (here below).

### **5. Categories of persons to whom the personal data may be disclosed**

5.1 The Personal Data collected for the purpose of the provision of the Service (point 2.1) may be disclosed to companies performing functions that are strictly linked and instrumental to the functioning of the Service, and in particular to respond to your requests.

5.2 The Personal Data collected for the purposes listed in point 2 may be transferred to third parties (located inside or outside the European Community), also for sale or attempted sale, i.e. all purposes of a lawful commercial and/or statistical nature. The list of persons to whom your personal data have been disclosed may be requested from PROXIMA using the e-mail address given in point 7.4.

### **6. Controller, Processors and Representatives**

Data Controller or Controller refers to the physical or legal person, public authority, service or other body which, individually or with others, determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by law by the European Union and the Member States, the Controller or the specific criteria applicable to his or her appointment may be established by the law of the European Union and the Member States;

6.1. The Controllers are PROXIMA Srl with registered office in Viale Gian Galeazzo, 3 MILANO, ITALY

6.2 The Controllers appoint external Processors to achieve the purposes specified in point 2. It is possible to request a complete list of external Processors by sending an e-mail to the e-mail address specified in point 7.4 of this policy.

6.3 The Controllers have appointed their own employees and collaborators to process the data.

6.4 Data subjects may exercise their rights towards each Controller.

### **7. Rights of the data subjects**

7.1 You have the right, at any time, to obtain confirmation from the Controller as to whether or not personal data concerning you is being processed, to know its origin, purposes and methods of processing; you also have the right to request the updating, correction, integration, erasure, transformation into an anonymous form, the suspension of any data processed in violation of the relevant legislation, including those which are no longer necessary to pursue the purposes for which they were collected and/or subsequently processed.

7.2 You have the right to object, wholly or partially, to the processing of your personal data for legitimate reasons, even where this is still relevant for the purpose for which they were collected, and to the processing of your personal data for the purpose of commercial information or the sending or advertising materials or direct sales or for the execution of market research or commercial communication.

7.3 You have the right to receive the Personal Data concerning you provided knowingly and actively through the use of the Service, in a structured, commonly used and machine-readable format, and to transmit those data to another controller without hindrance.

7.4 To exercise your rights please write to the specific e-mail address: [info@pxi.it](mailto:info@pxi.it).

7.5 Please note that you also have the right to lodge a complaint with the competent supervisory authority.

7.6 If you no longer wish to receive notifications via e-mail from PROXIMA and wish to unsubscribe from the newsletter, you may do so by clicking on the "erasure" link at the bottom of each e-mail sent by PROXIMA.

## **8. Period for which the personal data is stored**

8.1 Your personal data will be conserved in hard copy and/or electronic/computerised/optical format for the time strictly necessary to meet the purposes listed in point 2, in compliance with the laws in force. PROXIMA has defined the specific duration of the conservation of data for each type of data collected. At the end of such periods, PROXIMA will definitively erase your data.

8.2 If you request the erasure of your Personal Data from the Website. Please note that such data will be conserved for the purpose of the investigation and prosecution of breaches for a period of no more than 12 months from the date of communication, and will subsequently be erased safely in an anonymised and irreversible manner. Please also note that for the same purposes the data relating to telematic traffic, excluding in any case the contents of the communications, shall be kept for a period of no more than 12 months following the date of communication.

## **9 Amendments**

9.1 This Privacy Policy may be subject to amendments. If substantial amendments are made to the use of your Personal Data, PROXIMA will notify you by publishing a notice on the Website and/or by sending you an e-mail.

## **10 Contacts**

For any informing or request relating to this Privacy Policy, please contact us at the e-mail address [info@pxi.it](mailto:info@pxi.it), or write to us by post at the following address: PROXIMA, Viale Gian Galeazzo 3, 20136, Milano, Italy.

# **Cookies**

## **1. What are cookies and why are they used?**

A cookie is a short text string sent to the user's browser and, if necessary, is saved on the computer or mobile device, when you visit a website and is used to gather information on the navigation according to the website.

Cookies may be stored permanently on the user's computer or mobile device and have a variable duration (persistent cookies), but may also disappear when the browser is closed or be of limited duration (session cookies). Cookies may be installed by the website the user is visiting (proprietary cookies) or may be installed by other websites (third party cookies).

## **2. Types of cookies used and purposes**

The different types of Cookies used by PROXIMA Srl, in relation to the website [www.pxi.it](http://www.pxi.it) (the "Website") are described below:

- **Necessary:** “necessary” cookies are essential for helping you to surf the Website and use the relating functions, such as to access protected areas of the Website. Without these cookies, the Website will not function correctly. These cookies do not identify you as an individual.
- **Function:** “function” cookies are used by PROXIMA to store information on the choices made (e.g. user name, language, region) and enable personalisation. They may also be used to provide the services requested, such as the streaming of videos or the publication of a forum. The information gathered by these cookies may include identifiable personal information communicated by you, such as your user name or profile photo. PROXIMA will inform you of the type of information gathered, the purpose for which it is gathered and whom it will be shared with. If you do not accept these cookies, this may affect the performance and functions of the Website and could limit access to some contents of the Website.
- **Performance:** "performance" cookies are used to gather information on how the Website is used. These cookies gather data such as the pages you visit most frequently and the error messages you receive. PROXIMA uses these cookies to analyse user activities and improve the Website functions.
- **Advertising or tracking:** these cookies are used for profiling to provide more pertinent and targeted contents for you in relation to your interests. To allow us to provide you with information which most probably interests you, the cookies used by PROXIMA to show you advertising may be based on the contents you visit the most on the Website. The cookies limit the number of times an advertisement is displayed and provide us with information similar to that in which you saw the advertisement to help us to analyse the impact and value of PROXIMA advertising campaigns. They also include links to social networks and third party websites (for example Facebook and YouTube), which could therefore use information on your visit to target advertisements on their own websites.

### 3. Cookies used on the Website

In particular the characteristics of the cookies used on the Website are illustrated in the following table:

Name	Purpose	First party/Third party	Duration	Further information
_ga	This cookie is associated to Google Analytics and is used to distinguish users, assigning each one a number generated randomly as an identifier. It is used to calculate the number of visitors to the page, the sessions and data used to produce anonymised statistical analysis reports.	Third party analytics	The default expiry is set at 2 years	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_gat	This cookie is associated to Google Analytics, and is used to speed up access requests.	Third party analytics	The default expiry is set at every 10 minutes	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_gid	This cookie is used to distinguish users	Third party analytics	24 hours	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
1P_JAR	It stores the preferences and user information every time the web pages containing Google services are visited	Third party analytics	persistent cookies	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>

Name	Purpose	First party/Third party	Duration	Further information
_UTMA	This cookie is associated to Google Analytics	Third party analytics	The default expiry is set at 2 years	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_UTMB	This cookie is associated to Google Analytics	Third party analytics	The default expiry is set at every 30 minutes	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_UTMC	This cookie is associated to Google Analytics	Third party analytics	The expiry is set at the end of the session	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_UTMT	This cookie is associated to Google Analytics	Third party analytics	The default expiry is set at every 10 minutes	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_UTMZ	This cookie is associated to Google Analytics	Third party analytics	The default expiry is set at 6 months	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
DSID	The purpose of this cookie is to store information on user preferences.	Third party	6 months	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
NID	The purpose of this cookie is to store information on user preferences.	Third party	6 months	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
IDE	Performance: this cookie is used by Google DoubleClick to record and report on the user's actions on the website after having viewed or clicked on one of the advertiser's advertisements in order to measure the effectiveness of an advertisement and present targeted advertisements to the user.	Third party	6 months	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_has_JS	This cookie is necessary for Batch API Drupal processes and to control enabling to Javascript	First party technical	The expiry is set at the end of the session	N/A
displayCookieConsent	Documents the acceptance of the privacy banner	First party technical	2 years	N/A
SSESS[ID]	Cookie that stores the ID of the https session.	First party technical	1 month	N/A
_mkto_trk	Marketo uses cookies to show pertinent contents; improve products and services and guarantee the security of its websites	Third party	2 years	<a href="https://documents.marketo.com/legal/cookies/">https://documents.marketo.com/legal/cookies/</a>
RSMKTO1	Analysis	Third party	End of session	<a href="https://documents.marketo.com/legal/cookies/">https://documents.marketo.com/legal/cookies/</a>
SL_C_[ID]_KEY, SL_C_[ID]_GID, SL_C_[ID]_SID	Smartlook to anonymously control individual visitors to the website, and stores various cookies	Third party analytics	Disappears in 2 years	<a href="https://www.smartlook.com/help/gdpr/">https://www.smartlook.com/help/gdpr/</a>
lidc	Used for routing	Third party	1 day	<a href="https://www.linkedin.com/legal/cookie-table">https://www.linkedin.com/legal/cookie-table</a>
Bizoid	LinkedIn Ad analysis	Third party	6 months	<a href="https://www.linkedin.com/legal/cookie-table">https://www.linkedin.com/legal/cookie-table</a>

Name	Purpose	First party/Third party	Duration	Further information
UserMatchHistory, bcookie, lang	This cookie is used by LinkedIn to analyse visitors.	Third party	6 months	<a href="https://www.linkedin.com/legal/cookie-table">https://www.linkedin.com/legal/cookie-table</a>
__qca	The cookie __qca may use the computer IP address, the pixel code, the referred HTTP position, the current HTTP position, the search string, the time of access, the time of the browser, any searches made on the pertinent website and other statistics to analyse the Data Logs relating to different websites and combine them with other information that is not personally identifiable to produce reports made available on the website Quantcast.com, to allow publishers and web advertisers to serve appropriate audience segments for their products or services.	Third party	Not set	<a href="https://quantserve.com/">https://quantserve.com/</a>
mc, d	Tracks anonymous information on how visitors use our Website.	Third party	12 months	quantserve.com
bt2, vc	These cookies are used to track visitors. Functions for sharing via social media (Facebook, Twitter etc.). AddThis tracks visitors using one of their functions	Third party	Not set	<a href="http://www.addthis.com/">http://www.addthis.com/</a>
dpr, pl, wd, datr	Used by Facebook to offer a series of advertising products such as real time offers by third party advertisers.	Third party	Persistent	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>
fr, presence, sb, c_user	These cookies are set by Facebook. We use this service to demonstrate that you have appreciated our Website on the Facebook social network. Facebook may use this information to publish our advertisements on their platform.	Third party	Persistent	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>
xs	These cookies are set by Facebook. We use this service to demonstrate that you have "appreciated" our Website on the Facebook social network. Facebook may use this information to publish our advertisements on their platform.	Third party	Session	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>
lang	This cookie is set due to the integration of Twitter and the sharing capacities with social media.	Third party	Session	<a href="https://twitter.com/">https://twitter.com/</a>
personalization_id	Performance: this cookie is set due to the	Third party	2 years	<a href="https://twitter.com/">https://twitter.com/</a>

Name	Purpose	First party/Third party	Duration	Further information
	integration of Twitter and the sharing capacities			
BizolD	The BizolD cookie memorises a single LinkedIn user ID.	Third party	90 days	<a href="https://www.linkedin.com/legal/cookie_policy">https://www.linkedin.com/legal/cookie_policy</a>

#### 4. Other technologies and types of cookies

Cookies are not the only way of recognising or tracking visitors to a website. On a case-by-case basis, PROXIMA could use other technologies or instruments for the same or similar purposes for which it uses the cookies. In particular:

- **Web Beacons.** PROXIMA could use this technology, which consists of small graphic files containing a unique identifier which is used to recognise when someone has visited the Website or has opened an e-mail sent by PROXIMA. This is used to monitor the user traffic models from a page on the Website to another and to confer or communicate with the cookies, to understand if you have visited the Website following an advertisement displayed on a third party website, and to improve the performance of the Website and assess the success of the e-mail marketing campaigns. In many cases, these technologies rely on cookies to work correctly and therefore by refusing them the operation of these technologies could be compromised.
- **Social media functions.** The Website could, on a case by case basis, use social media functions, such as the “like” button on Facebook. These functions may gather your IP address and the page you are visiting on the Website and may set a cookie to ensure the correct operation of the function. This function may include the possibility to publish information on your activities on the Website on a page of your profile provided by a third party social media network to share it with others in your network. The social media functions, where used by PROXIMA, are hosted by a third party or direct on the Website. Your interactions with these functions are governed by the privacy policy of the company providing the social media functions.
- **Flash cookies:** the Website could also use this type of cookie, for example to gather and archive information on the use of PROXIMA services, to prevent fraud or other operations via the Website. If you do not wish Flash cookies to be archived on your computer, you can set the Flash Player settings to prevent their archiving, using the tools in the website archiving settings. You can also control Flash cookies from the “General storage settings” and following the instructions (which may include instructions which explain, for example, how to delete existing Flash cookies, how to prevent these cookies from entering your computer without being asked (for Flash Player 8 and subsequent versions) how to block Flash cookies which are not provided by the manager of the web page you are on at that moment). Flash Player settings to limit or limit the acceptance of Flash cookies may reduce or hinder the functions of some Flash applications, including, potentially, the Flash applications used in connection to the services of PROXIMA or Website contents.
- **Targeted and mobile online advertising:** PROXIMA could appoint one or more third parties, service providers, to track and analyse both individual use and statistical information on the volume of interactions with the Website. These providers may also offer cookies to your computer or mobile device for advertising purposes via the Website and provide other personalisation services in conformity with this Cookie Policy. These companies may gather and use information relating to visits to the Website and other sites to provide pertinent product and service advertising which could interest you. They may also use the technology used to measure and monitor the effectiveness of advertising through the use of cookies or web beacons. The information gathered through this

process does not allow PROXIMA to identify your name, contact details or other personal information that directly identifies you unless you decide to provide it.

## 5. How to give or revoke consent

Consent to the use of cookies is given initially in the following manners: by clicking on the “*Accept cookies*” and closing the relative banner, scrolling the page hosting the banner or clicking on any element, and can be revoked at any time. Users have the possibility to set their own devices to accept all cookies, receive notifications when a cookie is sent or not receive them. Cookies can be completely disabled from the browser using the specific function available in most browsers. Please note however that by disabling the cookies some personalised services may no longer be provided and some of the Website functions may not be usable. However, each browser is different, so consult the “Help” menu of your browser for instructions on how to change your cookie preferences. The methods proposed by major browsers are described below: [Chrome](#), [Firefox](#), [Internet Explorer](#), [Opera](#), [Safari](#) by downloading a specific [plug-in](#) for the browser:

- Internet Explorer <https://support.microsoft.com/it-it/help/17442/windows-internet-explorer...>
- Chrome <https://support.google.com/accounts/answer/61416?hl=it>
- Firefox <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>
- Opera <http://help.opera.com/Windows/10.00/it/cookies.html>
- Safari [https://support.apple.com/kb/PH19214?locale=it\\_IT](https://support.apple.com/kb/PH19214?locale=it_IT)

After this operation, however, some Web page functions may not run correctly.

## 6. Data communication

The data collected through the use of cookies may be processed by employees and/or collaborators of PROXIMA, indicated as representatives for the processing of data under the authority of PROXIMA [1], in its capacity as Controller, or by the Processor, where appointed. The aforementioned data collected could also be processed by third companies providing various types of service to PROXIMA and which work on its behalf in their capacity as Processors. The complete list of processors is constantly updated and is available on request by sending an e-mail to: [info@pxi.it](mailto:info@pxi.it).

The personal data will not in any case be disclosed.

[1] For the purposes of this Cookie Policy, “processing representatives” refers to the persons authorised to process personal data under the direct authority of the Controller or the Processor as laid down in articles 4(10) and 29 of the GDPR.