

## COOKIE POLICY

### Why a cookie policy?

MCS has adopted this cookie policy in order to protect the privacy of the visitors to the website [www.mcs-selection.it](http://www.mcs-selection.it). The policy ensures that visitors are fully aware of the cookies being stored on their device (PC, tablet, smartphone, notebook) during navigation, and allows them to make an informed choice about their acceptance of cookies.

This policy has been provided by Mcs Management Consulting & Selection S.r.l., with registered office in Via degli Arcimboldi 5, 20123 Milano, P.I. 11287860156, Italy, as website manager and data controller with respect to the cookies installed directly by this website, pursuant to Sections 13 and 122 of the legislative decree No. 196 of 30 June 2013 (the personal data protection Code, hereinafter the “Code”) and to the decision of the Italian Data Protection Authority No. 229 of 8 May 2014 (Simplified Arrangements to Provide Information and Obtain Consent Regarding Cookies).

In accordance with the “Cookie Law”, this page describes what visitors need to know about how MCS uses cookies and how to manage or remove them, if the users wish to do so; which information the cookies gather; how MCS uses them; and why MCS may need to store them. MCS will also disclose how visitors can prevent these cookies from being stored, which may downgrade or disable certain elements of the website.

For more information on cookies and on how to manage cookie preferences, users can visit the websites: [www.garanteprivacy.it/cookie](http://www.garanteprivacy.it/cookie).

### What are cookies?

Cookies are small text files that are sent to the user’s computer or mobile device (usually to the user’s browser) by the visited websites; they are stored in the user’s terminal equipment to be then re-transmitted to the websites on the user’s subsequent visits to those websites.

They enable the website to remember the user’s actions and preferences (such as login, language, font size and other display preferences), over a period of time, so he doesn’t have to keep re-entering them whenever he comes back to the site or browses from one page to another, for example.

Cookies do not cause any damage to the visitor’s device. They are not computer programs and cannot be used to circulate viruses.

Web pages may contain electronic images known as web beacons – sometimes called “clear GIFs”, “single-pixel GIFs”, or “web bugs”. Web beacons are used to deliver cookies on this website, count clicks/users/visitors, and to deliver co-branded content or services. The website may also contain web beacons from third parties to help the manager of this website to compile aggregated statistics regarding website operations. These web beacons may allow the third parties to set or read cookies on visitors’ device. In addition to the aforementioned cookies and web beacons, the website also uses other technologies to store and retrieve data from visitors device. This may be done to maintain their preferences or to improve speed and performance by storing certain files locally. All of these technologies are referred to as “cookies”.

### What are cookies used for?

Cookies are present as a rule in substantial numbers in each user’s browser and sometimes they remain stored for a long time. They are used for several purposes ranging from IT authentication to the monitoring of browsing sessions up to the storage of specific information on user configurations in accessing a given server, and so on.

In order to appropriately regulate these devices, it is necessary to distinguish them by having regard to the purposes sought by the entities relying on them, as there are no technical features that allow differentiating them. This is actually the approach followed by the Italian Parliament, which provided for the obligation to obtain the users’ prior informed consent to the installation of cookies for purposes other than those of a merely technical nature – according to EC directive 2009/136 (see Section 1(5), letter a), of the legislative decree No. 69 of 28 May 2012, which amended Section 122 of the Code).

From this point and for the purposes of this decree, cookies may be classified into two major groups: “technical” cookies and “profiling” cookies:

**1) Technical Cookies:** these are used exclusively with a view to “carrying out the transmission of a communication on an electronic communications network, or insofar, as this is strictly necessary to the provider of information society service that has been explicitly requested by the contracting party or user to provide the said service” (see Section 122(1) of the Code).

They are not used for further purposes and are usually installed directly by the data controller or the website manager. They can be grouped into:

- Browsing or Session cookies, which allow users to navigate and use a website (e.g. to purchase items online or authenticate themselves to access certain sections);
- Analytics cookies, which can be equated to the technical cookies, as they are used directly by the website manager to collect aggregate information on the number of visitors and the pattern of visits to the website;
- Functional cookies, which allow users to navigate in a certain pre-determined criteria such as language or products to be purchased in order to improve the quality of service.

Users’ prior consent is not necessary to install these cookies, whilst information under Section 13 of the code has to be provided in a manner that is considered to be most appropriate by the website manager – if only such cookies are relied upon.

Besides, taking into consideration the guidance that is provided by the “Article 29 Working Party”, in particular, its Opinion 4/2012 on Cookie Consent Exemption as adopted on 7 June 2012, the following cookies can be exempted from informed consent under certain conditions and if they are not used for additional purposes:

- user input cookies (session – id), for the duration of a session or persistent cookies limited to a few hours in some cases;
- authentication cookies, that are used for authenticated services, for the duration of a session;
- security cookies focused on users, used to detect the abuse of the authentication, for a limited persistent duration;
- multimedia content player session cookies, such as flash player cookies, for the duration of a session;
- load balancing session cookies, for the duration of session;
- customization persistent cookies, for the duration of a session (or slightly more);
- third party social plug-in content sharing cookies, for logged-in members of social networks.

With regard to the social networks, the working party notes, however, that the use of third party social plug-in cookies, for other purposes than to provide a functionality explicitly requested by their own members, requires consent, notably if these purposes involve tracking users across websites;

**2) Profiling Cookies:** are aimed at creating user profiles. They are used to send ads messages in line with the preferences shown by the user during navigation. Because of the highly invasive nature of these cookies vis-à-vis users’ private sphere, Italian and European legislation requires users to be informed appropriately of the use of these cookies, and to give their valid consent.

These cookies are referred to in Section 122(1) of the Code where it is provided that “storing information, or accessing information that is already stored, in the terminal equipment of a contracting party or user shall only be permitted on condition that the contracting party or user has given his consent after being informed, in accordance with the simplified arrangements mentioned in Section 13(3)”.

### Characteristics of a cookie?

Cookies are often categorized according to the following characteristics:

- whether they are “session cookies” or “persistent cookies”;
- whether they are “third party cookies” or not.

A “session cookie” is a cookie that is automatically deleted when the user closes his browser, while a “persistent cookie” is a cookie that remains stored in the user’s terminal device until it reaches a defined expiration date (which can be minutes, days or several years in the future).

The term “third party cookie” can be misleading:

- In the context of European data protection, the Directive 95/46/EC defines a third party as “any natural or legal person, public authority, agency or anyone else other than the data subject, the controller, the processor and the persons who, under the direct authority of the controller or the processor, are authorized to process the data. Thus, a “third party cookie”, would refer to a cookie set by a data controller that is distinct from the one that operates the website visited by the user (as defined by the current URL displayed in the address bar of the browser).
- However, from the perspective of browsers, the notion of “third party” is solely defined by looking at the structure of the URL displayed in the address bar of the browser. In this case “third party cookies” are cookies that are set by websites that belong to a domain that is distinct from the domain of the website visited by the user as displayed in the browser address bar, regardless of any consideration whether that entity is a distinct data controller or not.

## Why does this website use cookies?

This website uses cookies for a variety of reasons as mentioned below.

Some cookies are essential, it means that they are necessary to navigate the website and use its services and features. Enabling these cookies is not strictly necessary for the website to work, but it will provide the users a better browsing experience. Users can delete or block these cookies, but if they do that some features of this site may not work as intended.

Other cookies are non-essential; they may record users' preferences and enable the website to perform as they would like, or enable us to perform analytics or serve advertisements.

The main reasons for the cookies' presence on the site, are to:

- remember choice (acceptance cookie): this cookie is used to record when a user has given their implied consent for their use;
- keep track of the user's input (user's input cookies): this typical first party user's input session cookie is used to keep track of the user's input in a series of message exchanges with a service provider in a consistent manner: as when filling online forms over several pages or providing an information service explicitly requested by the user;
- remember the user (authentication cookie): this session cookie is used to identify the user once he logs in, so he can browse multiple pages and do things like downloading content without being asked for his log in details every time. This cookie is also needed to allow users to authenticate on successive visits to the website and gain access to the authorized content. This cookie is usually deleted when the user logs out. However, in some cases they may remain longer in order to remember their site preferences when logged out;
- store a user's preference (user interface customization cookie): this cookie is used regarding a service across web pages and not linked to other persistent identifiers such as the username. It is only set if the user has explicitly requested the service to remember a certain piece of information, for example, by clicking on a button or ticking a box. It can be a session cookie or have a lifespan counted in weeks or months, depending on their purpose. Typical examples of customization cookies are: language preference cookies that are used to remember the language selected by a user on a multilingual website (e.g. by clicking on a "flag"), result display preference cookies that are used to remember the user's preference regarding online search queries (e.g. by selecting the number of results per page);
- enable social sharing (social plug-in content sharing cookie): many social networks propose "social plug-in modules" that website operators can integrate in their platform notably to allow social networks users to share contents they like with their "friends" (and other related functionalities proposes such as publishing comments). These plug-ins store and access cookies in the user's terminal equipment in order to allow the social network to identify their members when they interact with these plug-ins. It is important to distinguish users who "logged-in" through their browser in a particular social network account, from "non-logged-in" users who are either simply not a member of that specific social network or who have "disconnected" from their social network account. Since by definition social plug-ins are destined to members of a particular social network, they are not of any use for non members, and therefore consent from non-members and "logged-out" members is needed before third party cookies can be used by social plug-ins;
- provide data for improving the websites (analytics cookie): analytics are statistical audience measuring tools for websites, which often rely on cookies. These tools are notably used by website owners to estimate the number of unique visitors, to detect the most preeminent search engine keywords that lead to a webpage or to track down website navigation issues. Analytics tools use a number of different data collection and analysis models, however the first party analytics cookies are not likely to create a privacy risk when they are strictly limited to first party aggregated statistical purposes and when they are used by websites that already provide clear information about these cookies in their privacy policy as well as adequate privacy safeguards. Such safeguards are expected to include a user friendly mechanism to opt-out from any data collection and comprehensive anonymization mechanisms that are applied to other collected identifiable information such as IP addresses;

This site does not use profiling cookies to send advertising messages in line with the user's online navigation preferences (behavioral advertising).

## First-party cookies

Pursuant to Italian "Cookie Law", the website manager describes in the table below the detailed features and purposes of the cookies installed by this website, including their duration and the consequences of their disabling.

COOKIE NAME	COOKIE TYPE	PURPOSE	DURATION	CONSEQUENCES OF DISABLING
Drupal.toolbar.collapsed	Technical cookie	To store user interface preferences when logged in.	100 years	Some interface preferences will not be available to logged in users.
has_js	Technical cookie	To record whether your browser has JavaScript enabled.	Session	Many parts of the website will not be available.
Drupal.tableDrag.showWeight	Technical cookie	Allows tables on website pages.	1 year	Disabling will cause issues in the display of tables.
SESSxxxx	Technical cookie	Session cookie for logged in users.	20 days	Cannot log in.
displayCookieConsent	Technical cookie	Records acceptance of Cookie Policy.	1 year	Disabling will cause the Cookie banner to be displayed on every new page load.

### Third-party cookies

Pursuant to Italian “Cookie Law”, this policy also contains an updated link to the information notices and consent forms of the third-parties who install cookies via this website.

Third parties’ cookies, especially analytics cookies, collect aggregate statistical data about how visitors use the site so that the website manager can improve the user experience and serve up the content that the visitors find most useful. These cookies store information about what pages users visit, how long they are on the website, how they got there and what they click on. They do not collect or store personal data and are not used for any purpose other than those described here.

This site also uses social media buttons and/or plug-ins that allow users to connect with their social network in various ways. In order to work, social media sites (such as Facebook, Twitter, e.g.) cookies will be set through this site which can be used to enhance their profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

A list of the third parties’ cookies used across this site can be seen in the table below:

COOKIE NAME	COOKIE TYPE	PURPOSE	LINK
_utma, _utmb, _utmc, _utmt, _utmz	Technical cookies	Google Analytics is one of the most widespread and trusted analytics solutions on the web for helping the website manager to understand how users use the site and how he can improve their experience. These cookies may track things such as how long users spend on the site and the pages that they visit so that we can continue to produce engaging content. For more information on Google Analytics cookies, see the official Google Analytics page.	<a href="#">Google Analytics</a>
engine_ssl_, engine_ssid_	Technical cookies	Vimeo cookies allow Vimeo videos to be displayed on the website.	<a href="#">Vimeo</a>

### How to manage cookies?

Users can control and/or delete cookies as they wish – for details, see [www.aboutcookies.org](http://www.aboutcookies.org), but it should be noted that disabling cookies will affect the functionality of this and many other websites that they visit.

They can delete all cookies that are already on their computer and they can set most browsers to prevent them from being placed. However, if they do this, they may have to manually adjust some preferences every time they visit a site and some services and functionalities may not work.

Unfortunately, in most cases there are no industry standard options for disabling cookies without disabling completely the functionality and features they add to this site.

### How to disable and to delete cookies?

Users can prevent placing cookies by adjusting the settings on their browser (see browser Help for how to do this), but they should be aware that by changing any of the settings they are likely to change their Internet navigation experience and conditions for accessing certain services requiring the use of cookies.

If they do not allow cookies to be stored on their device or delete any cookie already stored there, they will no longer have access to a certain number of functions that they might need for navigating certain areas of the website.

Visitors can decide to confirm or change their options at any time by configuring their navigation software so that cookies are either stored or blocked on their device. Certain browsers allow users to set the rules for managing cookies for individual sites.

Individual browsers are configured differently for managing cookies.

This is described in the browser's help menu, which will tell the user how to change the options:

- for Internet Explorer: <http://windows.microsoft.com/en-us/windows7/block-enable-or-allow-cookies>
- for Safari: <https://support.apple.com/en-us/HT201265>
- for Chrome: <https://support.google.com/chrome/answer/95647?hl=en&hlrm=en>
- for Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- for Opera: <http://help.opera.com/Windows/10.20/en/cookies.html>

Cookies can also be deleted:

- for Internet Explorer: <https://support.microsoft.com/en-us/kb/278835>
- for Safari: <https://support.apple.com/en-gb/HT201265>
- for Chrome: <https://support.google.com/accounts/answer/32050?hl=en>
- for Firefox: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- for Opera: <http://www.opera.com/help/tutorials/security/privacy>

### How are cookies used by the manager of this website?

The manager of this website uses cookies in full respect of Section 122 of the Code and of decision No. 229 of 8 May 2014, which establishes the lawfulness of these technologies for certain legitimate purposes related to technical storage for the strictly necessary time for the transmission of communication or to provide a specific service requested by the user, who can always refuse the processing of personal data related to storage cookies, by disabling one or more.

### How are personal data related to cookies processed?

Personal data collected in connection to the use of cookies will be processed using IT and computer systems and will be shared with individuals involved in the business organization of this website or external third parties (technical service suppliers, hosting providers, etc.). The data will be handled through instruments and with modalities that ensure data privacy and security, in accordance with the provisions of the Code.

### Are personal data communicated or disseminated?

Personal data related to the use of cookies are not communicated or disseminated: they will be brought to the attention of the processing officers appointed by the controller data and third parties (such as companies providing computer support and ensuring the proper functioning of the site), committed to achieve the purposes described in the tables before reported. In any case, the processing by third parties shall be fairly done and in compliance with the laws in force.

### What are the rights that the visitor has as a data subject?

Pursuant to Sections 7, 8, 9 and 10 of the Code, the visitor, as a data subject, shall have the right to obtain confirmation whether his personal data exist or not, regardless if they are already recorded, and to have communication about such data in an intelligible form. He shall have the right to be informed; a) of the source of the personal data; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if the latter is carried out with the help of electronic means; d) of the identification data concerning data controller, data processors and the representative designated as per Section 5(2); e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know the said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing. will have also the right to obtain; a) updating, rectification or, where interested therein, integration of the data; b) erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c) confirmation that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected. A data subject shall have the right to object, in whole or in part, a) on legitimate grounds, to the processing of personal data concerning

him/her, even though they are relevant to the purpose of the collection; b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

### **Who is the data controller?**

The data controller is MCS, with the registered office in Via degli Arcimboldi 5, 20123 Milano, P.I. 11287860156, Italy.

### **Amendments**

The website manager may change this Cookie Policy at any time. Visitors are invited to take a look at the last updated date at the bottom of this page to see when this Cookie Policy was last revised. Any changes in this Cookie Policy will become effective when the website manager makes the revised Cookie Policy available on or through the website.

### **More Information**

Hopefully we have clarified things for the users. As was previously mentioned, if there is something that the users are not sure whether they need or not, it's usually safer to leave cookies enabled in case they do interact with one of the features that the users use on our site. However if the users are still looking for more information, they can contact the website manager through e-mail: [milano@mcs-selection.it](mailto:milano@mcs-selection.it)

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