

## COOKIE POLICY

This "Cookie Policy" section has the specific aim of illustrating the different types of cookies installed on the Site, the purposes and how to use the same as well as providing indications about the ways in which You can deny, even later, your consent and / or modify, at any time and in an easy way, the options related to the use of cookies by the Site.

The **Data Controller** is, pursuant to Article 4 GDPR, European University of Rome, with registered office in Rome, at via degli Aldobrandeschi no. 190 (hereinafter also "**University**").

The **Data Protection Officer** is the Attorney Elena Maggio, who can be contacted to the following email address [dpo.emaggio@unier.it](mailto:dpo.emaggio@unier.it) or by calling the telephone number +39 333.2160001.

This Cookie Policy constitutes an integral part of the Privacy Policy [\[link\]](#).

For exercising Your rights provided by Artt. 15-22 GDPR , You can send an email to the following email address [dpo.emaggio@unier.it](mailto:dpo.emaggio@unier.it), while for changing the settings on cookies, You will need to modify the settings of your browser by following the instructions in this Cookie Policy.

### **What are cookies?**

Cookies are small text strings that sites visited by the user send to your terminal through the browser used to open and consult the web pages, where they are stored before being re-transmitted to the same sites at the next visit by the same user. While browsing on a web site, user can also receive on his terminal cookies that are sent from different websites or web servers (so-called "third parties"), on which certain elements may reside (such as, for example, images, maps, sounds, specific links to pages of other domains) present on the site that user is visiting.

By default, almost all web browsers are set to automatically accept cookies.

In the Provision no. 229 of 8 May 2014, the Italian Data Protection Authority has identified the following macro-categories of cookies.

1. Technical cookies: these cookies are used for the sole purpose of "*transmitting a communication over an electronic communication network, or as strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide this service*" (see Article 122, paragraph 1, of Legislative Decree No. 196/2003, also Privacy Code). They are not used for other purposes and are normally installed directly by the website owner or manager. They can be divided into:

- navigation or session cookies, which guarantee the normal browsing and use of the site (allowing, for example, to make a purchase or authenticate to access to restricted areas);
- analytics cookies, similar to technical cookies when used directly by the site manager to collect information, in aggregate form, on the number of users and how they visit the site;
- functionality cookies, which allow the user to browse according to a series of selected criteria (for example, the language, the products selected for purchase) in order to improve the service rendered to the same.

For the installation of these cookies, the prior consent of the users is not required, while remains the obligation to provide the privacy notice pursuant to art. 13 of the Regulation (EU) no. 2016/679,

which the site manager, if he uses only such devices, will be able to provide in the manner he considers most suitable.

2. Profiling cookies: they are designed to create user profiles and are used in order to send advertising messages in line with the preferences shown by the user in the context of web browsing.

Due to the particular invasiveness that such devices may have in the private sphere of users, European and Italian legislation provides that the user must be adequately informed about their use and express their valid consent. Refers to them Art. 122 Privacy Code where it provides, in paragraph 1, that *"the storage of information in the terminal equipment of a contractor or of a user or the access to information already stored is permitted only if the user has expressed his own consent after having been informed using the simplified procedures referred to in Article 13, paragraph 3"*.

Cookies can be installed on the user's terminal by the same site manager that the user is visiting (which can be briefly referred to as "**publisher**") or by a different site that installs cookies through the first (cd "**third party**") "). The Italian Data Protection Authority distinguishes between two subjects in order to correctly identify the respective roles and the respective responsibilities, with reference to the release of the information and to the acquisition of the consent of the online users. In fact, it is not possible to charge the publisher of providing the privacy notice and acquiring the consent for the installation of cookies within its site, even for those installed by "third parties", as the publisher often does not directly know all the third parties that install cookies through its site and, therefore, not even the logic underlying the relative processing. Furthermore, it is not uncommon for the publisher and third parties to interfere with the role of concessionaires, making it very complex for the publisher to control the activities of all the parties involved.

This would also cause a general lack of clarity in the privacy notice issued by the publisher, while at the same time making it extremely difficult for the user to read the document and therefore to understand the information contained therein, thereby also ruining the simplification intent envisaged by the Art. 122 Privacy Code.

### **How do cookies work and how can they be eliminated?**

Each user can set the browser of his terminal in such a way that it accepts / rejects all cookies or displays a warning whenever a cookie is proposed, in order to be able to evaluate whether to accept it or not.

The user is enabled, however, to modify the default configuration (by default) and disable cookies (i.e. block them definitively), setting the highest level of protection.

The ways to block or delete cookies from your device vary depending on the type of terminal and depending on the type of browser used.

If is used a fixed device (pc, laptop, notebook, netbook and similar) it is needed to change the browser settings:

- Internet explorer [guide: <http://windows.microsoft.com/it-it/windows7/block-enable-or-allow-cookies>]
- Chrome [guide: <https://support.google.com/chrome/answer/95647?hl=it>]
- Firefox [guide: <https://support.mozilla.org/it/kb/Bloccare%20i%20cookie>]
- Safari [guide: <https://support.apple.com/it-it/HT201265>]

If it is used a mobile device (smartphone or tablet) it is needed to change the settings of the terminal:

- Apple [guide: <https://support.apple.com/it-it/HT201265>]
- Android [guide: <https://support.google.com/chrome/answer/95647?hl=it>]
- Blackberries  
[guide: [http://docs.blackberry.com/en/smartphone\\_users/deliverables/32004/Turn\\_off\\_cookies\\_in\\_the\\_browser\\_60\\_1072866\\_11.jsp](http://docs.blackberry.com/en/smartphone_users/deliverables/32004/Turn_off_cookies_in_the_browser_60_1072866_11.jsp)].

For further information, please consult the guide prepared by Google and available at the link: <https://www.cookiechoices.org/>

### **What types and categories of cookies does the University use on the Site and for what purposes?**

This Site uses functional and analytical cookies.

Functional cookies allow the site to remember the user's choices in order to allow easier navigation. The data acquired through the technical analytical cookies are processed in an aggregate way, and therefore anonymous, in order to understand which are the most visited pages of the Site and, more generally, the way of use of the same. In particular, the Site uses:

#### **Google Analytics (Google Inc.)**

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google uses Personal Data collected for the purpose of tracking and examining the use of this Site, compiling reports and sharing them with other services developed by Google.

Google may use Personal Data to contextualize and personalize ads of its own advertising network.

Personal Data collected: Cookies and Browsing Data.

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

### **Additional types of cookies present**

#### **Interaction with external social networks and platforms**

Interaction services with social networks and external platforms allow interaction with social networks, or with other external platforms, directly from the pages of the Site. The interactions and information acquired from the Site are in any case subject to the user's privacy settings related to each social network. In the case in which an interaction service with social networks is installed, it is possible that, even if users do not use the service, it collects traffic data relating to the pages in which it is installed.

#### *Like button and Facebook social widgets (Facebook, Inc.)*

The "Like" button and Facebook social widgets are interaction services with the Facebook social network, provided by Facebook, Inc.

Personal data collected: cookies and usage data.

Place of processing: USA - [Privacy Policy](#)

*Tweet button and Twitter social widgets (Twitter, Inc.)*

The Tweet button and Twitter social widgets are interaction services with the Twitter social network, provided by Twitter, Inc.

Personal data collected: cookies and usage data.

Place of processing: USA - [Privacy Policy](#)

*Instagram social widgets (Instagram, Inc.)*

Instagram social widgets are services of interaction with the social network Instagram, provided by Instagram, Inc.

Personal data collected: cookies and usage data.

Place of processing: USA - [Privacy Policy](#)

### **Displaying content from external platforms**

Content viewing services from external platforms allow to view content hosted on external platforms directly from the pages of this Site and to interact with them.

If a service of this type is installed, it is possible that, even if users do not use the service, it collects traffic data relating to the pages in which it is installed.

*Youtube Video Widget (Google Inc.)*

Youtube is a video content visualization service managed by Google Inc. that allows this site to integrate such content within its pages.

Personal data collected: cookies and usage data.

Place of processing: USA - [Privacy Policy](#)

### **Cookie Policy Changes**

University reserves the right to change this cookie policy at any time. It is suggested to check at the end of the document, the "Last revision date" to verify when the last update dates.

Any change in this policy will take effect from the date of publication on the Site.

Date of the last revision 12 of June, 2018