COOKIE POLICY

1. Introduction

This Cookie Policy refers exclusively to the *https://alumni.hunimed.eu* website (hereinafter "**Website**").

Humanitas University (hereinafter, "**Data Controller**", "**Humanitas**"), pursuant to article 13 of EU Regulation 2016/679 - General Data Protection Regulation (hereinafter, "**GDPR**"), releases information regarding the processing of personal data carried out through cookies and similar technologies present within the pages of the Website.

2. Data Controller

The Data Controller is **Humanitas University**, with registered office in via Rita Levi Montalcini n. 4, Pieve Emanuele (MI), in the person of its *pro tempore* Managing Director.

The Data Controller processes personal data in compliance with the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimization, accuracy, integrity and confidentiality.

3. Definitions, characteristics and regulations applying to cookies

Cookies are small text files that the sites visited by the user send and record on their computer or mobile device to be later sent back to the same sites when a user returns for another visit. Thanks to cookies, a site remembers the user's actions and preferences (e.g. login details, language, font size, etc.), so that they do not have to be selected again when the user returns to visit said site or navigates from one page to another of it. Cookies are used therefore to perform authentication operations, browser session monitoring and storage of information regarding the activities of users accessing a site. They may also contain a unique identification code that makes it possible to keep track of your browsing within the site for statistical or advertising purposes.

While browsing a site, the user may receive on their computer or mobile device **"first-party" cookies** – if those are installed directly by the site manager – but also cookies from sites or web servers known as **"third-party" cookies** installed on the user's device by a party other than the site manager.

Some operations could not be carried out without the use of cookies, which in some cases are therefore technically necessary for the operation of the Website.

There are various types of cookies, according to their characteristics and functions, that may remain stored on your computer for different times. From this point of view, a distinction is made between **session cookies**, that are automatically deleted when the browser is closed, and **persistent cookies**, that instead remain stored on the user's device until a predetermined expiry term.

Pursuant to the regulations currently in force in Italy, the user's express consent is not always required in order to use cookies. In particular, the so-called "**technical cookies**" (*Strictly necessary cookies*), i.e. that is those cookies that are only used to send a communication over an electronic communications network, or to the extent strictly necessary to provide a service explicitly requested by the user, do not require such consent. In other words, these cookies are essential for the operation of the Website or necessary to perform activities requested by the user; allow you to use the contents and services of the same in an easy way: in fact, for example, you will not have to carry out any action on the banner containing the short

information at each access to the Website because the choice of consents will be recorded. Strictly necessary cookies cannot be disabled and the user's prior consent is not required for their installation. These cookies are stored in the user's browser for the time necessary to ensure the proper functioning of the Website and in any case, in the case of persistent cookies, for a maximum of 1 year.

Among the **technical cookies**, that require no express consent to be used, the Italian Data Protection Authority (cf. Provision "Individuazione delle modalità semplificate per l'informativa e l'acquisizione del consenso per l'uso dei cookie dell'8 maggio 2014") also includes *first-party analytical cookies and anonymised third-party analytical cookies (Performance analytics cookies).* The *Guidelines for cookies and other tracking tools - 10 June 2021 -* further clarify that analytics cookies are comparable to technical cookies only if the possibility of directly identifying the data subject (so-called *single out*) through their use is precluded, which is equivalent to preventing the use of analytics cookies which, due to their characteristics, they can be direct and unique identifiers. In this case, the structure of the analytics cookie provides for the possibility that the same cookie can be referred not only to one, but to several devices, so as to create reasonable uncertainty about the IT identity of the data subject. As a rule, this effect is obtained by masking appropriate portions of the IP address within the cookie (indicatively it is the obscuring of at least the fourth component of the address). Further clarifications concern the use of analytics cookies depending on whether they are First or Third Party. In this second case, the use of cookies is limited only to the production of aggregate statistics and are used in relation to a single Website or a single mobile application, so as not to allow the tracking of the navigation of the person who uses different applications or browses different websites. All cookies necessary for statistical analysis by third parties that do not involve a masking of the IP address or in any case such as to collect data that can be traced back, even indirectly, to the data subject fall into the category of *"performance analysis cookies"* for which Humanitas requires the user's explicit consent. On the other hand, the use of first-party analytics cookies is lawful, even in the absence of the adoption of the prescribed minimization measures, for statistical analyses relating to several domains, websites or apps attributable to the same data controller, provided that the latter proceeds with the statistical processing on its own, without in any case such analyses resulting in an activity that, going beyond the boundaries of a mere statistical count, in reality, it takes on the characteristics of an elaboration aimed at taking decisions of a commercial nature (so-called *profiling purposes*).

For **profiling cookies** or **cookies for behavioral advertising** *(Targeting cookies),* i.e. the cookies aimed at creating user profiles and used to send advertising messages that match the preferences shown by the user while browsing online, a prior consent of the user is required. This type of cookie is used to track the user's navigation on the Website to analyze their behavior for marketing purposes and create a profile regarding their tastes, habits and choices. In this way, Humanitas can transmit targeted advertising messages to the user in line with the preferences expressed by the user while browsing. Also, to carry out a better targeting activity. These cookies are not necessary for the operation of the Website, so the user's consent is required for their installation. This category includes analytics cookies that do not anonymize portions of the user's IP address.

Among the tracking tools there are also "tracking pixels", web beacons one-pixel images (1x1 images, typically a GIF file) that, when requested from the server, allow the user to keep track of the fact that the user is displaying the page containing it. Tracking pixels are generally installed to profile the user commercial purposes.

4. Cookie types used by the Website

The Website uses different types of cookies as listed below:

- **Strictly necessary cookies (*i.e.* technical)**
- **Performance analysis cookies (*i.e.* analytical)**

It should be noted that with reference to third-party cookies, the user must refer directly to the relative selection and de-selection methods indicated by means of the links below.

WARNING: *if you disable some cookies, the Website should not be available, and some services or certain functions of the Website should not be available or should not function properly. You may therefore be forced to change or manually enter certain information or preferences each time you visit the Website.*

- **Third-party cookies:**

  - **Google** (Google Tag Manager e Google Analytics)

In detail, the cookies sent by Humanitas University through the Website are indicated below:

Name	cookieyes-consent
Type of cookie	Necessary
Purpose and need for consent	Stores the user's cookie consent preferences and records which categories of cookies have been accepted or rejected. This cookie is strictly necessary and does not require prior consent.
First Party/Third Party	First Party
Persistence	1 year

Name	pll_language
Type of cookie	Necessary
Purpose and need for consent	Stores the language selected by the user in order to display website content in the chosen language. This cookie is strictly necessary and does not require prior consent.
First Party/Third Party	First Party
Persistence	1 year

Name	wordpress_logged_in_*
Type of cookie	Necessary
Purpose and need for consent	Indicates when a user is logged in and maintains the authenticated session. This cookie is necessary and does not require prior consent.
First Party/Third Party	First Party
Persistence	Session

Name	wordpress_sec_*
Type of cookie	Necessary
Purpose and need for consent	Provides security for authenticated sessions and prevents unauthorized access. This cookie is necessary and does not require prior consent.
First Party/Third Party	First Party
Persistence	Session

Name	wp-settings-time-*
Type of cookie	Necessary
Purpose and need for consent	Stores the timestamp of the last update of user interface settings for logged-in users. This cookie is necessary and does not require prior consent.
First Party/Third Party	First Party
Persistence	1 year

Name	wordpress_test_cookie
Type of cookie	Necessary
Purpose and need for consent	Verifies whether the user's browser supports cookies and enables basic WordPress functionality.
First Party/Third Party	First Party
Persistence	Session

Name	AEC
Type of cookie	Analytics
Purpose and need for consent	Ensures that requests within a browsing session are made by the user and not by other Websites, supporting security and abuse prevention.
First Party/Third Party	Third Party (Google)
Persistence	~6 months

Name	APISID
Type of cookie	Analytics
Purpose and need for consent	Used for security, authentication, and integrity purposes related to Google services.
First Party/Third Party	Third Party (Google)
Persistence	~2 years

Name	HSID
Type of cookie	Analytics

Purpose and need for consent	Used for security and authentication to protect user accounts and data.
First Party/Third Party	Third Party (Google)
Persistence	~2 years

Name	NID
Type of cookie	Analytics
Purpose and need for consent	Stores user preferences for Google services.
First Party/Third Party	Third Party (Google)
Persistence	~6 months

Name	SAPISID
Type of cookie	Analytics
Purpose and need for consent	Used for security, authentication, and service integrity purposes.
First Party/Third Party	Third Party (Google)
Persistence	~2 years

Name	SID
Type of cookie	Analytics
Purpose and need for consent	Used for security and authentication to protect user accounts.
First Party/Third Party	Third Party (Google)
Persistence	~2 years

Name	SIDCC
Type of cookie	Analytics
Purpose and need for consent	Provides additional security protections against abuse.
First Party/Third Party	Third Party (Google)
Persistence	~1 year

Name	SOCS
Type of cookie	Analytics
Purpose and need for consent	Stores the user's consent status for Google services.

First Party/Third Party	Third Party (Google)
Persistence	~13 months

Name	SSID
Type of cookie	Analytics
Purpose and need for consent	Used for security and authentication related to Google services.
First Party/Third Party	Third Party (Google)
Persistence	~2 years

Name	__Secure-1PAPISID
Type of cookie	Analytics
Purpose and need for consent	Secure version of APISID, used for security and integrity checks.
First Party/Third Party	Third Party (Google)
Persistence	~2 years

Name	__Secure-1PSID
Type of cookie	Analytics
Purpose and need for consent	Secure version of SID, used for authentication and security.
First Party/Third Party	Third Party (Google)
Persistence	~2 years

5. Cookie settings

At the first access on the Website, there is a banner that contains brief information and a command that allows you to open the MANAGE link through which you can easily choose which cookies to install. You can access the cookie consent area at any time and easily through a specific link in the footer of the Website.

In addition to the above, you can also change your cookie settings through the browser you use, deleting all or some cookies or limiting the sending of cookies to certain websites. Below are the instructions for changing the cookie settings for the most common browsers used:

- **Internet Explorer**

- **Google Chrome**

- **Safari**

- **Firefox**

Disabling cookies or deleting them may compromise the optimal use of some areas of the Website or prevent some features, as well as affect the operation of third-party services.

The user can block or delete (in whole or in part) technical and functional cookies through the specific functions of his browser.

6. How to collect consent to the use of cookies

When the user accesses the Website homepage, the system displays a Banner containing a brief version of the cookie policy. The user has the right to accept or not, in a granular way, cookies, possibly also from third parties, through unequivocal choices as set in the banner on the homepage of the Website.

7. Transfer of personal data

The personal data collected through the first-party cookies – i.e. cookies installed by Humanitas Mirasole S.p.A. – on the Website are not transferred outside the European Union. In any case it is understood that, where necessary, the Controller shall be entitled to transfer the personal data to extra-EU countries too, ensuring hereby that the data shall be transferred in compliance with the law provisions and thus signing, if and insofar as necessary, specific agreements ensuring an adequate level of protection of the personal data, or anyway adopting the Standard Contractual Clauses provided for by the European Commission for the transfer of personal data to extra-EU countries.

With particular reference, however, to transfers of personal data carried out by means of third-party cookies, please refer to the respective data processing policies referred to in the links indicated in point 4 of this Cookie Policy.

8. Categories of recipients

The personal data collected through cookies can be shared with:

- persons authorized by the Data Controller to process personal data, as employees and/or collaborators pursuant to Article 29 of the GDPR and 2-quaterdecies of the Privacy Code, who have received appropriate operating instructions, have committed to keep the data confidential or are subject to an appropriate legal obligation of confidentiality.
- subjects delegated and/or appointed by the Data Controller to carry out activities strictly related to the pursuing of specific purposes (including, but not limited to, technical maintenance operations on the systems), duly appointed as Data Processors pursuant to Article 28 of the GDPR.

9. Data subject rights and DPO contact details

In line with the provisions of the GDPR, the user has the right to request from the Data Controller, at any time, the access to his/her personal data, as well as its rectification or erasure, or to object to its processing. The law also allows the user to exercise the right to request the limitation of processing in the cases provided for by article 18 of the GDPR, as well as to obtain the data concerning you in a structured format of common use and readable by automatic device, in the cases provided for by art. 20 of the GDPR.

Requests can be sent to the Data Controller by filling in the dedicated form on the **website** www.humanitas.it/privacy **or** by writing to **privacy@humanitas.it** or **privacy.humanitas@pec.it.**

For any further data protection activities, please refer to the Data Protection Officer (DPO), via Manzoni 56 20089 Rozzano (Milan), e-mail: **dataprotectionofficer@humanitas.it**.

If the data subject notices a violation of the law in the processing of his/her personal data, he/she has the right to lodge a complaint with the Italian Data Protection Authority, pursuant to article 77 of the GDPR. However, the possibility of appealing before the competent judicial authority remains unaffected.

For further information on your rights and data protection regulations regarding cookies, you can visit the website of the Italian Data Protection Authority at the following link [Cookie - Privacy Guarantor](#).

10. Updates

This Cookie Policy should be subject to updates. Users are therefore invited to periodically check their content.