COOKIE POLICY OF TERME DI TORRE CANNE S.R.L.
(*on www.termeditorrecanne.it*)

1. GENERAL INFORMATION

This document provides information regarding the technologies that enable this Website to achieve the purposes described below. These technologies allow the Data Controller to collect and store information (for example, through the use of Cookies) or to utilize resources (for example, by executing a script) on the User's device when they interact with this Website.
For simplicity, these technologies are collectively referred to in this document as "Tracking Tools", unless a distinction is required.
For example, although Cookies may be used in both web and mobile browsers, it would be inappropriate to refer to Cookies in the context of mobile applications, as these Tracking Tools require a browser to function. Therefore, in this document, the term "Cookie" is used exclusively to refer to that specific type of Tracking Tool.
Some of the purposes for which Tracking Tools are used may require the User's consent. Where consent is given, it may be freely withdrawn at any time by following the instructions provided in this document.
This Website uses Tracking Tools managed directly by the Data Controller (commonly referred to as "first-party Tracking Tools") and Tracking Tools that enable services provided by third parties (commonly referred to as "third-party Tracking Tools"). Unless otherwise specified in this document, such third parties may access their respective Tracking Tools.
The duration and expiration of Cookies and other similar Tracking Tools may vary depending on the settings defined by the Data Controller or by each third-party provider. Some of them expire at the end of the User's browsing session.
In addition to what is specified in the descriptions of each category listed below, Users can obtain more detailed and up-to-date information on duration, as well as any other relevant details—such as the presence of additional Tracking Tools—by consulting the privacy policies of the respective third-party providers (accessible via the provided links) or by contacting the Data Controller.
We distinguish between two categories of cookies:
(1) Technical cookies, without which the functionality of our website would be reduced; and
(2) Optional cookies, which are profiling cookies used for site analytics and marketing purposes. Optional cookies may always carry a risk of profiling. Therefore, to clarify whether cookies are mandatory or optional, we categorize them according to the two legal categories: technical cookies and profiling cookies.
This website is developed using the WordPress platform and employs Elementor as the page builder system. Certain modules, widgets, and plugins may use technical tracking technologies to ensure proper functionality.

2. INFORMATION ON COOKIES AND TYPES OF COOKIES USED

Below is a detailed description of the cookies used by Terme di Torre Canne:

A) TECHNICAL COOKIES or other tracking tools (functional)

used to carry out activities that are strictly necessary to ensure the operation or provision of the Service.
Consent Solution by iubenda (iubenda srl)

The iubenda Consent Solution allows the storage and retrieval of User consent records for the processing of Personal Data, as well as the information and preferences expressed in relation to the consent provided.
To this end, it uses a Tracking Tool that temporarily stores pending information on the User's device until it is processed via the API. The Tracking Tool (a browser feature known as *localStorage*) is then deleted.

Personal Data processed: Data provided while using the service and Tracking Tools.
Place of processing: Italy – Privacy Policy.
Storage duration:

- ConS JS library localStorage (**IUB_DATA**): not defined

Cookie Solution di iubenda (iubenda srl)
The iubenda Cookie Solution allows the Data Controller to collect and store User preferences regarding the processing of personal data, specifically in relation to the use of Cookies and other Tracking Tools on this Website.
Personal Data processed: Tracking Tools
Place of processing: Italy – Privacy Policy
Storage duration:

- _iub_cs-*: 1 year

Elementor (Elementor Ltd.)
This site uses Elementor, a visual page builder for WordPress, which enables the creation and dynamic management of pages. Some modules or widgets may use technical tracking technologies to ensure the proper functioning of the site, its content, and dynamic components.
Data processed: Technical Tracking Tools
Storage duration: Session-based or persistent (via *localStorage*)
Place of processing: Israel – Privacy Policy

WPForms (WPForms LLC)
WPForms is a WordPress plugin that enables the creation of contact, booking, and request forms. The cookies used are technical in nature and serve, for example, for anti-spam protection and the temporary storage of data entered by users.
Data processed: Data entered by the user in the forms, technical tracking tools
Storage duration: Duration of the session
Place of processing: United States – Privacy Policy

Intercom (Intercom, Inc.)
This site uses Intercom, an automated messaging and knowledge base system. While it does not directly require personal data, Intercom sets cookies to ensure the proper functioning of the chat feature and, in some cases, to identify the user's session.
Common cookies: intercom-session-*, intercom-id-*
Data processed: Unique identifiers, session usage data

Storage duration: From session to 9 months
Place of processing: United States – Privacy Policy, Cookie Policy / Opt-out

Functionality
Some tools used on this site—such as contact forms (WPForms), email marketing services (Brevo), or support systems (Intercom)—may use cookies or technical tracking technologies to manage user requests or to optimize the overall experience.

Tool Management
Google Tag Manager (Google LLC)
Google Tag Manager is a technical tool that enables the management and activation of third-party tags (e.g., Google Analytics, Meta Pixel). It does not use its own cookies but may trigger tools that do.
Data processed: Anonymized usage data, tags activated on the site
Storage duration: Not applicable
Place of processing: United States – Privacy Policy

Other Tracking Tools

- **Hosting and Backend Infrastructure**

These types of services are designed to host data and files that allow this Website to function properly, enable its distribution, and provide a ready-to-use infrastructure to deliver specific features of the Website.

Some of the services listed below, if applicable, may operate on geographically distributed servers, making it difficult to determine the actual location where Personal Data is stored.

ctu_consent:
Stores user settings related to cookie preferences.
Place of processing: Italy – [Privacy Policy]

Storage duration:

- 1 year

PHPSESSID:
Enables identification of the user's current browsing session.

Place of processing: Italy – [Privacy Policy]

Storage duration: Session duration

To manage the various tags on our website, we use **Google Tag Manager**. This tool does not use cookies and does not collect personal data; however, through the Tag Manager, other tags may be activated that could collect anonymous usage data.

1. **Description**: Google Tag Manager allows us to quickly implement and update tags and code snippets on our website without having to modify the source code.

2. **Data Usage**: The Tag Manager itself does not collect personal data. However, the tags triggered through the Tag Manager may collect usage data such as:
• Number of website visitors
• Pages visited
• Time spent on each page
• Interactions with the site (clicks, scrolling, etc.)

B) OPTIONAL COOKIES (Profiling Cookies)

b.1 Measurement

This Website uses Tracking Tools to measure traffic and analyze User behavior in order to improve the Service.

- **Heat Mapping and Session Recording**

Heat mapping services are used to identify the areas of this Website with which Users interact most frequently, helping to highlight which sections attract the most interest. These services allow monitoring and analysis of traffic data and help track User behavior.
Some of these services may record sessions and make them available for later viewing.

Microsoft Clarity

Microsoft Clarity is a heat mapping and session recording service provided by Microsoft Corporation.
Microsoft processes or receives Personal Data through Microsoft Clarity, which may in turn be used for any purpose in accordance with Microsoft's Privacy Policy, including to improve and provide Microsoft Advertising.

- **Statistics**

The services under this category allow the Data Controller to generate and manage anonymous statistics through the use of first-party Tracking Tools.

Google Analytics with anonymized IP

We use Google Analytics on our website as an optional cookie. This is a web analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States ("Google").
Google analyzes the use of our website on our behalf.
For this purpose, we use the cookies described above. The information collected by Google in connection with your use of our website (e.g., referring URL, pages visited, browser type, language settings, operating system, and screen resolution) will be transmitted to a Google server, where it will be stored and analyzed. The resulting data will then be made available to us in anonymized form.
During this process, your usage data will not be associated with your full IP address. We have activated the IP anonymization feature offered by Google on our website, which removes the last 8 bits (for IPv4) or the last 80 bits (for IPv6) of your IP address before any processing or storage.
In addition, Google is certified under the EU-U.S. Privacy Shield, ensuring an adequate level of protection for personal data processed by Google in the United States.

Personal Data processed: Usage data and Tracking Tools
Place of processing:
• United States – Privacy Policy – Opt Out
• Ireland – Privacy Policy – Opt Out

Storage duration:
• AMP_TOKEN: 1 hour
• _ga: 2 years
• _gac*: 3 months
• _gat: 1 minute
• _gid: 1 day

b.1 Marketing
This Website uses Tracking Tools to deliver personalized commercial content based on the User's behavior and to manage, distribute, and track advertising campaigns.

- **Advertising**

Meta Ads Conversion Tracking (Meta Pixel) – Meta Platforms, Inc.
Meta Ads Conversion Tracking (Meta Pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta advertising network with actions performed on this Website. The Meta Pixel tracks conversions that can be attributed to Facebook, Instagram, and Audience Network ads.

Personal Data processed: Usage data and Tracking Tools
Place of processing: United States – Privacy Policy – Opt out

Storage duration:
• _fbp: 3 months
• fr: 3 months

Google Ad Manager (Google Ireland Limited)
Google Ad Manager is an advertising service provided by Google Ireland Limited that allows the Data Controller to run advertising campaigns in conjunction with external advertising networks with which the Controller has no direct relationship, unless otherwise specified in this document.
For a better understanding of how Google uses the collected data, please refer to the Google Partner Policy.

This service uses the "DoubleClick" cookie, which tracks the use of this Website and User behavior in relation to ads, products, and services offered.

Users can choose to disable all DoubleClick cookies at any time by visiting: Ad Settings
Personal Data processed: Cookies and Usage Data
Place of processing: Ireland – Privacy Policy
Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days

- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- __gads: 2 years
- __gsas: 2 years
- gac*: 3 months
- gcl*: 3 months
- id: 2 years
- test_cookie: 15 minutes

Google Ads Conversion Tracking (Google Ireland Limited)
Google Ads Conversion Tracking is an analytics service provided by Google Ireland Limited that connects data from the Google Ads advertising network with actions performed on this Website.
Personal Data processed: Usage data and Tracking Tools
Place of processing: Ireland – Privacy Policy
Storage duration:
- IDE: 2 years
- test_cookie: 15 minutes

Google Ads
Google Ads is an advertising service provided by Google that allows the Data Controller to run advertising campaigns in collaboration with external advertising networks, with which the Controller has no direct relationship unless otherwise specified in this document.

LinkedIn Insight Tag (LinkedIn Corporation)
LinkedIn Insight Tag enables conversion tracking and the creation of custom audiences for LinkedIn Ads campaigns.
Common cookies: UserMatchHistory, bcookie, lidc, li_sugr
Data processed: LinkedIn user ID, visited URLs, IP address, browser data
Storage duration: From session to 1 year
Place of processing: United States – Privacy Policy

Newsletter Tracking and Remarketing

Brevo (formerly Sendinblue)

We use Brevo as our email marketing and automation platform. Brevo may activate cookies and tracking pixels upon email opens or link clicks in order to monitor user interactions. Cookies and parameters used:

• visitor_id (cookie): tracks anonymous user session
• _sc, _se (URL parameters): identify visits originating from email campaigns
Data processed: Email address, IP address, post-click browsing behavior, interactions with the newsletter
Storage duration: Variable (persistent until identification or revocation)
Place of processing: Europe – Privacy Policy
Legal basis: Explicit consent

- **Remarketing e behavioral targeting**

This type of service allows this Website and its partners to communicate, optimize, and deliver advertisements based on the User's past use of this Website.
This activity is facilitated by the tracking of Usage Data and the use of Tracking Tools to collect information that is then transferred to partners that manage remarketing and behavioral targeting activities.
Some services may offer a remarketing option based on email address lists.

In addition to the opt-out features offered by the services listed below, Users may opt out by visiting the Network Advertising Initiative's opt-out page.

Users can also manage their preferences through the appropriate device settings, such as mobile advertising preferences or general advertising settings on their device.

Meta Custom Audiences (Meta Platforms, Inc.)
Meta Custom Audiences is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of this Website with the Meta advertising network.

Users can choose to opt out of Meta's Tracking Tools for ad personalization by visiting the opt-out page.
Personal Data processed: Cookies and email address
Place of processing: United States – Privacy Policy – Opt out
Storage duration:
• _fbp: 3 months

Facebook Remarketing (Meta Platforms, Inc.)
acebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. that connects the activity of this Website with the Meta advertising network.
Personal Data processed: Cookies and Usage Data
Place of processing: United States – Privacy Policy – Opt out
Storage duration:
• _fbp: 3 months

Google Ads Remarketing (Google Ireland Limited)
Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google Ireland Limited that connects the activity of this Website with the Google Ads advertising network and the DoubleClick cookie.

For more information on how Google uses data, please refer to the Google Partner Policy.

Users can choose to opt out of Google's Tracking Tools for ad personalization by visiting Google Ads Settings.

Personal Data processed: Usage Data and Tracking Tools
Place of processing: Ireland – Privacy Policy – Opt Out
Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- __gads: 2 years
- __gsas: 2 years
- *gac**: 3 months
- *gcl**: 3 months
- id: 2 years
- test_cookie: 15 minutes

Conclusions and Technical Notices
In addition to cookies, this Website may use similar tracking technologies such as localStorage, sessionStorage, Web Beacons, or server-side tools that serve the same technical, analytical, or profiling purposes.

How to manage preferences and give or withdraw consent
There are various ways for Users to manage preferences related to Tracking Tools and to give or withdraw consent, where required.
Users can manage their Tracking Tool preferences directly through their device settings—for example, by blocking or deleting storage of Tracking Tools.
Furthermore, whenever the use of Tracking Tools is based on consent, the User may provide or withdraw such consent by setting their preferences in the cookie policy or by updating them via the consent preferences widget, if available.
It is also possible to delete previously stored Tracking Tools— including those used to remember the User's initial consent preferences—via specific browser or device features.
Other Tracking Tools stored in the browser's local memory can be removed by clearing the browsing history.

As for third-party Tracking Tools, Users can manage their preferences by visiting the corresponding opt-out link (if provided), by following the instructions in the third party's privacy policy, or by contacting the third party directly.

How to Find Settings Related to Tracking Tools
Users can, for example, find information on how to manage Cookies in some of the most commonly used browsers at the following links:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

Users can also manage certain Tracking Tools for mobile applications by disabling them through their device settings, such as mobile advertising settings or general tracking preferences (Users may refer to their device settings to locate the relevant option).

We will use optional cookies only if we have obtained your consent. When you first visit our Website, a banner will appear containing a brief notice:

We and selected third parties use cookies or similar technologies for technical purposes and, with your consent, also for other purposes as specified in the cookie policy. Refusing consent may make related functionalities unavailable.Use the "Accept all" button to give your consent. Use the "Only necessary" button to continue without consenting.

The banner provides the following options: Only necessary – Accept all – Learn more and customize.
By clicking on "Accept all" or by selecting one or more categories (experience / measurement / marketing) after choosing "Learn more and customize", you give us your consent to set optional cookies.

If you provide your consent, we will place a cookie on your device and the banner will not be shown again as long as that cookie remains active.
If you actively delete the cookie or it expires, the banner will reappear upon your next visit to our website and will request your consent again.

Withdrawal of Consent and Effects
You can withdraw your consent to the use of optional cookies and web analytics at any time by visiting https://www.termeditorrecanne.it or by updating your preferences in the relevant table by setting an opt-out cookie. Both options will prevent the use of optional cookies and web analytics, but only when using the browser in which the opt-out cookie was installed and as long as the opt-out cookie is not deleted.
For more information, please contact: privacy@termeditorrecanne.it
How to Prevent Cookie Installation
Of course, you can use our website without cookies being installed. You can configure or completely disable the use of cookies in your browser settings at any time.

However, this may result in limited functionality or negatively affect the usability of our website. At any time, you can refuse the installation of optional cookies by using the “consent / do not consent” option.

Consequences of Refusing the Use of Tracking Tools
Users are free to choose whether or not to allow the use of Tracking Tools. However, please note that Tracking Tools enable this Website to provide Users with an enhanced experience and advanced features (in line with the purposes outlined in this document). Therefore, if the User decides to block the use of Tracking Tools, the Controller may not be able to provide the related functionalities.
Since the use of third-party Tracking Tools on this Website cannot be fully controlled by the Controller, any specific reference to third-party Tracking Tools should be considered indicative. To obtain complete information, Users are kindly invited to consult the privacy policies of the respective third-party services listed in this document.
Given the objective complexity of identifying tracking technologies, Users are encouraged to contact the Controller should they wish to receive further information regarding the use of such technologies on this Website.

3 INFORMATION ABOUT YOUR RIGHTS

Pursuant to Articles 15 et seq. of the GDPR, you are guaranteed the following rights in relation to the processing of your personal data:
Right to access your personal data held by us; Right to request the rectification, erasure, or restriction of the processing of personal data; Right to object to processing based on legitimate interest, public interest, or profiling, unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or that such processing is necessary for the establishment, exercise, or defense of legal claims; Right to data portability; Right to lodge a complaint with a Data Protection Authority; At any time, you may withdraw any consent you have previously given, with effect for the future. Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. For further information, please refer to the previous paragraphs describing processing based on your consent.
If you wish to exercise your rights, you may send your request to the contacts listed in the following “Contacts” section.

4. CONTACTS

If you wish to exercise your rights or request further information, you may contact the Data Controller, Terme di Torre Canne Srl, Viale Bovio 235 – 65124 Pescara (PE), e-mail: privacy@termeditorrecanne.it, or the Data Protection Officer by sending an email to: rpd@termeditorrecanne.it or writing to:
Data Protection Officer – Via Caravaggio 125 – 65125 Pescara.

Data Controller
Terme di Torre Canne Srl
Viale Bovio 235 – 65124 Pescara (PE)
VAT no.: 01674090681
Data Controller’s email address: privacy@termeditorrecanne.it

5. DEFINITIONS

Personal Data (or Data)
Personal Data means any information that, directly or indirectly, and even in connection with any other information, including a personal identification number—makes a natural person identified or identifiable.

Usage Data
Usage Data is the information collected automatically through this Website (including from third-party applications integrated into this Website), such as: the IP addresses or domain names of the computers used by the User who connects to the Website, the URI (Uniform Resource Identifier) addresses, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the server's response status (success, error, etc.), the country of origin, the characteristics of the browser and operating system used by the visitor, the various time details of the visit (e.g. time spent on each page), and the details about the path followed within the Application, with particular reference to the sequence of pages visited, and parameters related to the User's operating system and IT environment.

User
The individual who uses this Website and who, unless otherwise specified, coincides with the Data Subject.

Data Subject
The natural person to whom the Personal Data refers.

Data Processor (or Processor)
The natural or legal person, public authority, agency, or other body that processes Personal Data on behalf of the Data Controller, as described in this privacy policy.

Data Controller (or Controller)
The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website.
Unless otherwise specified, the Data Controller is the owner of this Website.

This Website (or this Application)
The hardware or software tool by which the Personal Data of Users is collected and processed.

Service
The service provided by this Website as described in the relevant terms (if available) on this site/application.

European Union (or EU)
Unless otherwise specified, any reference to the European Union in this document is intended to include all current member states of the European Union and the European Economic Area.

Cookie
Cookies are Tracking Tools consisting of small data fragments stored in the User's browser.

Tracking Tool
Tracking Tool means any technology—such as cookies, unique identifiers, web beacons, embedded scripts, e-tags, and fingerprinting—that allows the tracking of Users, for example by collecting or storing information on the User's device.

Tag
A tag is a small piece of code embedded in a website or mobile application that enables the collection of information about how the website or application is used. Tags can be integrated directly into the site's code or managed via a Tag Management System. The use of tags may involve the collection of personal data or other information about the user, depending on how they are configured and their intended purpose.

Annex A – Summary Table of Cookies and Tracking Tools

Cookie Name / Tool	Duration	Purpose	Provider	Category
_ga	2 years	Google Analytics statistics	Google	Analytics
_gid	1 day	Google Analytics statistics	Google	Analytics
_gat	1 minute	Request limiting	Google	Analytics
_gac_*	3 months	Campaign attribution	Google	Analytics
AMP_TOKEN	1 hour	AMP statistics	Google	Analytics
IDE	2 years	Advertisements	Google / DoubleClick	Marketing
test_cookie	15 minuts	Cookie compatibility check	Google / DoubleClick	Marketing
DSID	14 days	Advertisements	Google / DoubleClick	Marketing
_fbp	3 months	Facebook remarketing	Meta (Facebook)	Marketing
fr	3 months	Facebook remarketing	Meta (Facebook)	Marketing
_fbc	3 months	Facebook conversion tracking	Meta	Marketing
ctu_consent	1 year	Storing cookie preferences	Iubenda	Technical
PHPSESSID	Session	Session management	Website server	Technical
_iub_cs-*	1 year	Consent management via Iubenda	iubenda	Technical
intercom-session-*	up to 1 week	Chatbot session	Intercom	Functional
intercom-id-*	up to 9 months	Anonymous user identifier	Intercom	Functional

VISITOR_PRIVACY_METADATA	7 months	YouTube embedded	Google / YouTube	Experience
yt-remote-*	Session / Undefined	Player embedded YouTube	YouTube	Experience
elementor	Persistent	Page builder management	Elementor (Israele)	Functional
lidc, bcookie, UserMatchHistory, ecc.	1 day – 1 year	LinkedIn ads tracking	LinkedIn Corporation	Marketing
iU5q-*, yt-player-head-ers-readable	Session / Undefined	YouTube video player	Google	Experience
_gcl_*	3 months	Google Ads conversions	Google	Marketing
id	2 years	DoubleClick ID cookie	Google	Marketing
visitor_id	Until identification	Anonymous user session identification	Brevo	Marketing
_sc (parametro URL)	On click from email	Associates visit with email re-cipient	Brevo	Marketing
_se (parametro URL)	On click from email	Email source tracking	Brevo	Marketing
Google Tag Manager	No first-party cookies	Management of tags and activa-tion of tracking tools	Google	Technical