



COOKIE POLICY

Study Tours International S.r.l. cares about the accuracy and safeness of processing the data provided by its clients, suppliers and workers.

In this frameworks, Study Tours International S.r.l. has implemented all the measures required by Regulation EU 679/2016 for the processing of data.

The present document is prepared by the data controller, as the controller of the data resulting by using the present website.

The data controller informs all the users that this website uses technical cookies in order to permit an optimal best browsing experience. The present Cookies Policy describes the types of cookies and the other technologies used in the website, and the purposes and conditions of using cookies. We hereby inform you that certain cookies are necessary to consent browsing of this website and that, by continue browsing this website, you agree to the use of such cookies.

Users could at any time avoid the installation of cookies by setting properly their browser or disabling the use of websites through the browser directly, as hereinafter specified.

DATA CONTROLLER

The Data Controller is Study Tours International S.r.l., based in Milan, Via Filippo Turati n. 32.

For any inquiry about cookies, please send an e.mail to the following address: datacontroller@studytours.it

COOKIES USED IN THIS WEBSITE

This website uses the cookies in order to provide simple and efficient services to the users of the website.

All the users shall notice that minimum quantity of information are inserted in their devices (computers or mobiles) as small text files called cookies, saved within the directories used by the browser. There are several kinds of cookies which have the task to make the website more efficient or to enable certain functions.

A detailed analysis of our cookies allows you to:

- store the preferences entered;
- avoid the repetitive data entering during the same session (for example: ID and password);
- analyse of services and contents provided by the website in order to maximise the browsing experience and the services provided.

COOKIES TYPES

Technical cookies

This kind of cookies allows the correct functioning of certain sections of this website.

There are two categories of technical cookies:

- *persistent* – once quitted the browser, these cookies are not erased but remain stored until a pre-set date;
- *by session* – these cookies are erased every time the browser is quitted.

These cookies, sent by our domain, are necessary for a correct displaying of our website and in relation to technical services provided, and will always be used and sent, unless the users will modify the preferences of their browsers (in this way invalidating the displaying of the website).

Analytical cookies

The cookies within this category are used to store information on the use of the website. This information are used for anonymous statistic analysis in order to optimize the website use and to make the contents more interesting and pertaining to the users' wishes. This typology of cookie stores anonymously data on users activities and how the website has been reached. Analytical cookies are sent by the website or by third party domains.

Third parties services analysis cookies

These cookies are used in order to collect information on the website use by the users in anonymous way just like: pages visited, residence time, origins of provenience traffic, geographic provenience, age, gender and interest for marketing campaign. These cookies are sent by third parties domains external to the website.

Third parties software integration cookies (if applicable)



This typology of cookies integrates functionality developed by third parties within the pages of our website (icons, preferences expressed on social networks in order to share our website contents or to use software services by third parties, like generating maps and further software that offers additional features). These cookies are sent by third parties domains and by partners websites that offer their functionalities within our website pages.

Profiling cookies (if applicable)

These cookies are necessary to create users profiles in order to send advertising messages in accordance with user's preferences as expressed within our website pages.

The website, accordingly to the existing legislation, is not required to ask the consent for the technical cookies and for the analytics, insofar they are necessary to provide the requested services.

For any other cookies typology, the user's content shall be expressed with one or more of the following modalities:

- by way of specific setup of the browser or of the relevant software used to browsing the pages of our website;
- by way of modifying the preferences for the use of third parties services.

Both the aforementioned solutions could prevent the users to use or to display certain parts of the website.

Third parties websites and services

Our website could contain links to other websites that provide their own privacy disclaimer that could be different from ours. Therefore the data controller of our website won't be responsible for third parties services.

COOKIES LIST

Study Tours International S.r.l. uses different typologies of cookies with various functions. We hereby reserve to publish on a regular basis a table to indicate the typologies of cookies used and the useful references to acknowledge on the specific purposes of use.

Nowadays, the cookies used are the following:

cookie name: fr (Facebook)

cookie type: profiling

link to disclaimer: <https://www.facebook.com/about/privacy/update>

cookie name: tr (Facebook)

cookie type: profiling

link to disclaimer: <https://www.facebook.com/about/privacy/update>

cookie name: *Google Analytics*

cookie type: profiling

link to disclaimer:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=it>

HOW TO DISABLE COOKIE THROUGH YOUR BROWSER SETTINGS

If you wish to deepen the modalities with which your browser memorizes cookies during a browsing session, please use the following links:

Mozilla Firefox (<https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>)

Google Chrome (<https://support.google.com/chrome/answer/95647?hl=it>)

Internet Explorer (<http://windows.microsoft.com/it-it/windows-vista/block-or-allow-cookies>)

Safari 8 (https://support.apple.com/kb/PH19214?viewlocale=it_IT&locale=it_IT)

Safari on Iphone/Ipad (<https://support.apple.com/it-it/HT201265>)

DATA SUBJECT RIGHTS



The cookies' use could be enabled following the above instruction.

In any case, we hereby include a summary of the rights under Regulation EU 679/2016, you can exercise by sending an e.mail to the following address: datacontroller@studytours.it

In your quality of data subject, you shall exercise certain rights as provided by Regulation EU 679/2016 and other applicable rules concerning data protection.

Your rights as data subject under Regulation EU 679/2016 are the following:

Data subject rights

In your quality of data subject, you have the following rights:

- a. **right of access**. At any time you can ask to have information about your data as stored by us. Such information regards, among the others, the categories of data processed, the purposes of processing, the origin of the data in case we didn't obtain such data directly from you, as well as the recipients to who we may have transferred your data, if applicable. You could obtain a free copy of your data. If you wish to have further copies, Study Tours International S.r.l. reserves the right to ask a remuneration for them.
- b. **right of rectification**. At any time you can ask a rectification of your data. As a consequence, Study Tours International S.r.l. will adopt appropriate actions to make your data – as stored and processed by us on an ongoing basis – to be kept correct, complete, updated and pertinent, on the basis of the most updated data granted.
- c. **right to erasure**. At any time you can ask the erasure of your data, subject to conditions as provided by the law. For example, that could happen as set forth in Article 17 of Regulation EU n. 679/2016:
 - if your data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - if you withdraw consent on which the processing is based and there is no other legal ground for the processing;
 - if you object to the processing and there are no overriding legitimate grounds for the processing;
 - if your personal data have been unlawfully processed, unless the processing is necessary: (i) for the fulfillment of a legal requirement that pretends the processing of your data; in particular for what it regards the period of storage of the documents as set forth by the law; (ii) for the establishment, exercise or the defence of a legal right or claim.
- d. **right to restriction of processing**. At any time you can obtain a restriction of processing your data if:
 - you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data;
 - the processing is unlawful and you oppose to the erasure of the personal data and request the restriction of their use instead;
 - we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
 - you have objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.
- e. **right to data portability**. At any time you have the right to receive a copy of your data as they have been prior provided directly to Study Tours International S.r.l. on your explicit request, we will transfer your data – if it is technically workable – to another controller.
- f. **right to object**. At any time you can object, on grounds relating to your particular situation, to the processing of your data pursuant to point e) or f) of Article 6, (1) of Regulation EU n. 679/2016, or whenever personal data are processed for direct marketing purposes. In such case, we will no longer process your data. This last condition is not applicable if we can demonstrate that compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- g. **right to obtain a copy of the safeguards**. At any time you can obtain a copy of the appropriate safeguards implemented for what it regards the data transfer toward third countries, if applicable.



- h. **right to withdraw the consent at any time**. At any time you can withdraw the consent, if the processing is based on your consent, without prejudice to lawfulness of the processing based on the consent granted prior to the withdrawal, by sending a request to the address afore indicated or otherwise with technical procedures made available by Study Tours International S.r.l. for the relevant processing.

Last update: July 2018