DEDICO Cookie Policy

Updated 25 June 2019.

Dedico uses cookies and similar technologies to help provide, protect, and improve the Dedico Platform. This policy explains how and why we use these technologies and the choices you have.

A cookie is a small data file that is transferred to your device (e.g. your phone or your computer). For example, a cookie could allow us to recognize your browser, while another could store your preferences. Cookies are stored by your browser for a certain period of time, that depends on the type of cookie: (1) "session cookies" and (2) "persistent cookies." Session cookies normally expire when you close your browser, while persistent cookies remain on your device after you close your browser, and can be used again the next time you access the Dedico Platform.

We also use other technologies with similar functionality to cookies, such as web beacons, pixels, mobile identifiers, and tracking URLs, to obtain Log Data (as described in the <u>Privacy Policy</u>). For example, our email messages may contain web beacons and tracking URLs to determine whether you have opened a certain message or accessed a certain link.

Why Dedico Uses These Technologies

We use these technologies for a number of purposes, such as:

- To enable you to use and access the Dedico Platform and book a holiday. For example, we place a session cookie that remembers which workshop you started booking so that if you go back to change your booking, you don't need to start from scratch.
- To enable, facilitate and streamline the functioning of and your access to the Dedico Platform. For example, we place a cookie to remember your currency preference, if you want to see the prices in a different currency.
- To better understand how you navigate through and interact with the Dedico Platform and to improve the Dedico Platform.
- To serve you tailored advertising (on the Dedico Platform and on third party websites).
- To show you content (e.g. Workshops) that is more relevant to you. For example, we may store information about the types of workshops you've looked at to show you more of the same type.
- To monitor and analyze the performance, operation, and effectiveness of the Dedico Platform and Dedico advertisements.
- To enforce legal agreements that govern use of the Dedico Platform.
- For fraud detection and prevention, and investigations.
- For purposes of our own customer support, analytics, research, product development, and regulatory compliance.

Third Parties

We may also allow certain business partners to place these technologies on the Dedico Platform. These partners use these technologies to (1) help us analyze how you use the Dedico Platform, such as by noting the third party services from which you arrived, (2) market and advertise Dedico services to you on the Dedico Platform and third party websites, (3) help us detect or prevent fraud or conduct risk assessments, or (4) collect information about your activities on the Dedico Platform, other sites, and/or the ads you have clicked on. For example, to help us better understand how people use the Dedico Platform, we work with a number of analytics partners, including Google Analytics. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-Out Browser by <u>clicking here</u>.

Third parties may also use such tracking technologies to serve ads that they believe are most likely to be of interest to you and measure the effectiveness of their ads both on the Dedico Platform and on other websites and online services. Targeting and advertising cookies we use may include Google, Facebook, AdTraction and other advertising networks and services we use from time to time. For more information about targeting and advertising cookies and how you can opt out, you can visit the <u>Network Advertising Initiative's opt-out page</u>, the <u>Digital Advertising Alliance's opt-out page</u>, or <u>http://youronlinechoices.eu</u>. To opt out of Google Analytics for display advertising or customize Google display network ads, you can visit the <u>Google Ads Settings</u> page. To the extent advertising content. In that case, the advertising content will just not be tailored to your interests. Also, we do not control any of these opt-out links and are not responsible for the availability or accuracy of these mechanisms.

Third Party Social Plugins

The Dedico Platform may use social plugins provided and operated by third parties, such as Facebook's Like Button. As a result of this, you may send to the third party the information that you are viewing on a certain part of the Dedico Platform. If you are not logged into your account with the third party, then the third party may not know your identity. If you are logged in to your account with the third party, then the third party may be able to link information or actions about your interactions with the Dedico Platform to your account with them. Please refer to the third party's privacy policies to learn more about its data practices.

Your Choices

We want to make sure that you have full control of your privacy and decide yourself which cookies you wish to accept. In order to help you make a choice, we've grouped these settings in 3 categories:

"Functional Cookies"

These cookies are necessary for a smooth operation of our website:

- We place a *session_id* cookie to track your current session and store temporary settings and input, like the fact that you're logged in, which language you've chosen, or which steps you've already filled in during the booking process.
- There's also a *csrftoken* cookie which protects the data you submit to us against hackers.
- We use a *cur* cookie to save your currency preferences.
- And finally, we store a *hasConsent* cookie to store your cookie preferences.

We don't let you switch off these cookies, since they are required for the website to function properly. See also the section *Browser Settings* at the end of this document.

"Statistics Cookies"

These cookies enable us to collect data about how our website is used. Every time you open a page or click on a link, we register this click.

If you select to allow only Statistics Cookies, we collect this data entirely anonymously: We anonymise your IP address and we don't enrich it with any information about you which we may know. Nothing in the data can be

traced back to you or to your previous visits to our website.

We use Google Analytics for our statistics, which places the _ga, _gat and _gid cookies on our domain (<u>dedi.co</u>).

"Marketing Cookies"

These cookies allow us to measure the effectiveness of our advertising campaigns and other communications on various 3rd party channels (e.g. Twitter, Facebook, Instagram) and allow our advertising partners (websites where we place advertisements for Dedico) to better determine which ad they should show you based on your previous activity on Dedico. For example, if you found Dedico by clicking on one of our ads on Facebook, and then browsed mostly through our Italian language courses, we might present you an ad for a new Italian course when it's added a few weeks later. These cookies also help to prevent you from seeing our ads too many times.

We are collaborating with the following 3rd parties:

- Google (including YouTube): We run AdWords and YouTube campaigns (ads that you see when you search on Google) and optimise these campaigns if you've already visited our website previously.
- Facebook (including Instagram): We run ads on Facebook and Instagram, which will reflect your preferences if you have visited our website.
- Hotjar: We use this took to understand your behaviour on our website. This is only for the purpose of learning how we can improve your experience. The tool records how you use our website across multiple visits and devices.
- AdTraction: We run ads via AdTraction's affiliates network (<u>adtraction.com</u>), so if you visit a website that belongs to this network, click on one of our ads and decide to book a course with us, we will understand how you reached us and be able to remunerate our partners for leading you to our website.

If you allow us to place Marketing Cookies, you will receive the *_fbp* cookie from Facebook on our domain, the Google cookies *_gads*, *_gac*, and *_gcl* on our domain, the *IDE*, *exchange_uid* and *Conversion* cookies from Google (various *google* and *doubleclick* domains), multiple cookies from Hotjar such as *ajs*, *_hj*, various Google analytics cookies on the *hotjar.com* domain and the *at*. or *at_* cookies from AdTraction on our domain. Some of these cookies are only placed if you clicked on one of our ads while browsing our ad partners websites.

By giving us permission to place Marketing Cookies, you also give us permission to enrich our statistics with some information about you, such as whether you're a Teacher or a Student, or an anonymous user ID so that we can aggregate the behaviour of our users over multiple visits.

Tell us your preferences

The first time that you visit our website, we let you choose which types of cookies you wish to accept by presenting you with a "**Cookie Banner**". Once you've accepted your choice, we remember it for 13 months or until you delete the *hasConsent* cookie for the <u>dedi.co</u> website.

If you want to review your choices or change them, you can visit <u>this page</u> at any time. When viewing this page online, your cookie preferences are shown below this paragraph.

You can also reset your preferences by deleting the *hasConsent* cookie from your browser. This will force us to show you the Cookie Banner again next time you visit our website.

Browser settings

Most browsers automatically accept cookies, but you can modify your browser settings to decline cookies by visiting the Help or Preferences portion of your browser's toolbar.

Your mobile device may allow you to control cookies through its settings function. Refer to your device manufacturer's instructions for more information.

Some browsers offer a "*Do not track*" option, which has the purpose of disabling any cookies that may track you across different websites. Dedico fully supports this setting and will automatically disable Marketing Cookies if you've enabled this option. Note that you will not be able to accept Marketing Cookies in your preferences when you have enabled this option. Please disable it first if you wish to see Dedico adverts that are better tailored to your preferences and behaviour.

If you choose to decline cookies entirely, which would include Functional Cookies, some parts of the Dedico Platform may not work as intended or may not work at all.