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**Business Owner**

**Document Number**

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## 1. Purpose

Pursuant to article 13 of the European Regulation n. 679/2016, (concerning the protection of individuals with regard to the processing of personal data), Dabico Airport Solutions, (hereinafter "Dabico" or "Company"), provides you with the following information regarding the cookies installed on the domain dabico.com, (hereinafter "Site"), or from other domains accessible through the Site.

## 2. Background

Cookies are text strings sent from websites and stored on users' computer hard disks or on any device used to access the Internet (smartphone, tablet etc.). They are transmitted back to the same sites during subsequent visits. Cookies can be stored on the user's computer for variable amounts of time: either permanently, (persistent cookies), or they are erased when the browser is closed, (session cookies).

Cookies are installed by sites you visit, (first-party cookies), or by other websites, (third-party cookies), and are used to perform actions such as computer authentication, session monitoring and storing information regarding the activities of users accessing the site.

Cookies are typically defined by the following functions:

- Navigation and functionality: used respectively for authentication and user experience improvement purposes (i.e. memorization of language preferences)
- Analysis: used by the site manager to collect information about users who visit the site
- Advertising: used to send messages in line with users' preferences collected during web browsing
- Social: used to allow interaction with social networks

Under current legislation, an explicit acceptance of cookies by the user is not required if they are defined as "technical" cookies, i.e. aimed exclusively at transmitting a communication over an electronic communication network.

As indicated by the Data Protection Supervisor, (see General Provision "Identification of simplified procedures for information and acquisition of consent for the use of cookies - 8 May 2014"), the following cookies are considered technical:

- analytical cookies where used directly by the site manager to collect information, in aggregate and anonymous form, on the number of users and how they visit the site
- navigation and functionality cookies
- According to current legislation, prior consent is required for the installation of profiling cookies.

For this reason, when users access the Site, a banner informs users that cookies are adopted, and that Site user

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needs to agree or disagree to the use of cookies. Since some of the cookies the Company uses relate to the functionality of the Site, if “disagree” is selected, the site may not work properly. This Policy outlines our data processing practices, where we Process Personal Data gathered from and about Site visitors, our customers, vendors and suppliers.

### 3. Policy

#### 3.1. How does Dabico use Cookies?

##### 3.1.1. Navigational and Functional Cookies

Dabico uses navigation cookies and functionalities on the Website to allow safe and efficient navigation and use of the Site as well as to improve services provided by the Site. The navigation cookies and features used by Dabico on the Site are “technical”.

##### 3.1.2. Analytical Cookies

Dabico uses analytical cookies on the Site, including third-party cookies, to collect information on its use by users (number of visitors, pages visited, time spent on the site, conversions, etc.). For the use of analytical cookies, tools have been adopted that reduce the identifying power and tools to avoid cross-referencing data collected with those that third-party platforms may already have. The analytical cookies used by Dabico on the Site are “technical”.

##### 3.1.3. Advertising cookies

Dabico does not use advertising cookies.

##### 3.1.4. Social cookies

Dabico does not use social cookies that allow users to interact with social networks by sharing content.

##### 3.1.5. Site Cookie Summary Table

This includes Processing Personal Data to be able to manage order and provide the company you represent with our products and services.

## Website Cookie Policy

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Organization	Cookies	Details	Type	Data Processing	Legal Form
Google	_ga, _gat, _gid, _gcl_a	Domain: Dabico.com Purpose: Used for analysis and tracking activities Settings: Anonymization of IP addresses; not sharing data with third party (Google); deactivation of Google Analytics' advertising service; acceptance amendment on data processing Duration: Session and permanent	Firstparty technical cookies	Google Policy Cookies Policy Opt-out	Legitimate Interest
Dabico	Phpsessid	Domain: Dabico.com, careers.Dabico.com Purpose: Used to start the navigation session of the user Duration: Session	Firstparty technical cookies	Dabico Policy Cookies Policy	Legitimate Interest
Youtube	Apisid Consent Hsid Login_info Pref Sapisid Sid Sidcc Visitor_info1_live Ysc	Domain: youtube.com Purpose: Used to show video preview in web pages (generally the first frame of the video is shown) Duration: different according to cookies from session to 19 years	Thirdparty	Youtube Policy Cookies Policy	Legitimate Interest
Dabico	_csrf	Domain: Dabico.com, careers.Dabico.com Purpose: Used for security to validate the origin of the requests Duration: Session	Firstparty technical cookies	Dabico Policy Cookies Policy	Legitimate Interest
Dabico	Media-libraryunlocked	Domain: Dabico.com Purpose: Used after user data registration, allow the download of the media library Duration: 1 year	Firstparty technical cookies	Dabico Policy Cookies Policy	Legitimate Interest

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## 3.2. Managing Cookie Preferences

### 3.2.1. Navigational and Functional Cookies

Navigation and functionality cookies are necessary for the functioning of the Site and can be disabled only by preventing their use (by configuring the navigation browser to disable cookies). Instructions on how to disable cookies on leading browsers are provided below:

- Internet Explorer <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Chrome <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Safari <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>
- Opera <https://blogs.opera.com/news/2015/08/how-to-manage-cookies-in-opera/>

Please note that disabling cookies may limit the functionality of and services provided by the Site.

### 3.2.2. Analytical Cookies

All analytical cookies used on the Site are from third parties. Dabico is unable to control how data is used or stored by third parties. Please refer to the Data Processing column in the table above for details regarding policies adopted by third parts. To prevent the use of analytical cookies, users should refer to the disabling methods provided by each browser, or the specific opt-out features made available by third parties, (see above).

### 3.2.3. Advertising and Social Cookies

Under personal data protection legislation, user consent is required for the use of advertising and profiling social cookies. When accessing the first page of the Site, therefore, users are shown a banner with an option to agree or disagree to the use of profiling cookies. The consent to the use of profiling cookies may be modified at any time by accessing this page and changing this preference.

## 3.3. Communication and Transmission of Data

Data collected by cookies may be processed by employees and third parties who have been expressly authorized by the Company to process such data and who have received appropriate operating instructions.

This data may also be processed by trusted service providers that perform technical and organizational tasks on our behalf. Such providers work directly with the Company and perform the function of data controller.

Data may also be processed by external parties acting as autonomous holders, such as, authorities and supervisory and control bodies. Data collected using cookies, (for example by Google), may be transferred

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to the United States of America and, in compliance with the relevant principles, also for Google Analytics, the level of data protection was deemed adequate by the European Commission in compliance with current legislation.

## 4. Your Rights

By contacting the DPO by email [dpo@dabico.com](mailto:dpo@dabico.com), interested parties can ask the owner to access data concerning them, request such data to be deleted, the treatment limitation in the cases provided for by Article 18 GDPR, as well as the opposition to the processing in the hypotheses of legitimate interest of the owner.

Furthermore, if the treatment is based on consent or on the contract and is carried out with automated tools, the interested parties have the right to receive the data in a structured format, commonly used and automatically readable, as well as, if technically feasible, to transmit them to another holder without impediment.

Interested parties have the right to withdraw consent for profiling cookies, as well as to oppose cookies used for marketing purposes, without affecting the functioning and functionality of the site. Interested parties have the right to lodge a complaint with the competent supervisory authority in the Member State in which they usually reside or work or of the State in which the alleged violation occurred.

## 5. How to Contact Us

If you have questions or comments regarding this Cookie Policy, or you would like to exercise your privacy rights, if applicable, you can contact us at the following address: [dpo@dabico.com](mailto:dpo@dabico.com) or by notifying us in writing at our address:

Attn: DPO  
Dabico Airport Solutions  
Plot No: S10128,  
Jebel Ali Free Zone,  
Post Box: 61124, Dubai

You may also notify us in writing at the address of our representative in the EU:

Attn: DPO  
Dabico Airport Solutions Germany GmbH  
Gottlieb-Daimler-Straße 7  
63128 Dietzenbach, Germany



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Rev	Reason for Change	Description of Change	Date	Author
01	Initial draft of policy	Create	04/25/2021	Greg Ballou

Approved by Name	Title	Date
Greg Ballou	CIO	01MAY2022