

CUSTOMER POLICY
ON THE PROTECTION OF PERSONAL DATA
PURSUANT TO ART. 13 OF LGS. D. NO. 196 OF 30.06.2003

Whereas,

- pursuant to art. 4 letter f) of Lgs.D. 196/2003, the Data Controller is the natural or legal person responsible for taking decisions regarding the purposes and methods of personal data processing and the tools used, including the security profile;
- pursuant to art. 4 letter i) of Lgs.D. 196/2003, following a change in legislation, by data subject is meant the natural person to whom the personal data belongs, thus excluding legal persons;
- pursuant to art. 13 of Lgs.D. 196/2003, the Data Controller is required to inform the data subject or the person from whom the personal data is collected in advance regarding its processing;
- in compliance with art. 13, paragraph 4, of Lgs.D. no. 196/2003, as amended and supplemented, in the case of relations between legal persons, through the customer (legal persons) of the Data Controller, the policy will be provided to any data subjects involved in the related processing should they work for, provide professional services to, collaborate with or entertain commercial relations with the aforementioned and to all those whose data may nevertheless be disclosed, known and/or processed by the Data Controller in the performance and execution of the main relationship. In any case, it will be the customer's responsibility to ensure that the data subject is fully aware of its essential elements.

Now, therefore, **Altaeco S.p.a.**, with registered office in Via Giovanni Pascoli 4/6, 20010 Vittuone, Milan (MI), as Data Controller, hereby informs customers about the processing purposes and methods of the personal data collected, its scope of disclosure and dissemination, as well as the nature of its provision.

PERSONAL DATA SUBJECT TO PROCESSING AND PROCESSING PURPOSE

The personal and especially identification, administrative, accounting and fiscal and commercial and IT, and possibly judicial, data processed, directly referring to the customer, and for essentially identification but also judicial and possibly sensitive data referring to other data subjects (such as collaborators, employees, representatives, customers' customers, customers' debtors, third parties, etc.) disclosed by the same in execution and performance of the relationships with the Data Controller and in compliance with the provisions on the processing and protection of personal data, is used for the pursuit of purposes instrumental and/or complementary to the activities expressed in the bylaws and instrumental to performing the contractual/pre-contractual relationship in place with the data subject in relation to the services requested by the latter.

Please note that the data may also be used for the purposes of so-called "soft spamming".

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Moreover, should the data subject provide his/her appropriate consent, the aforesaid identification data of data subjects (by way of example but not limited to, name, surname, telephone number, e-mail address) may be processed for marketing and commercial communication activities also by telephone, text message, MMS, traditional and electronic mail.

With the consent of the data subject, the data acquired may be entered in specific databases to analyse the life style and consumption choices, defining individual or group commercial profiles enabling better services and targeted commercial proposals to be provided.

DATA PROCESSING METHODS

Data processing is carried out through IT procedures or in any case telematic means or on paper by internal or external parties specifically appointed for such purpose or committed to confidentiality. The data is stored in IT and electronic files, with full assurance of implementation of the minimum security measures required by law.

Any communications of marketing or promotional nature related to the activities and the services of the Data Controller will be delivered via automatic contact methods or using traditional channels (e.g. snail mail and/or calls with an operator) in compliance with art. 130 of Lgs. D. 196/2003.

DISCLOSURE AND DISSEMINATION

The data collected will not be disclosed or disseminated. Disclosure to third parties, other than the Data Controller, Data Processors and persons responsible for processing identified and appointed pursuant to arts. 29 and 30 of Lgs.D. no. 196/2003, as amended and supplemented, is possible for the exclusive pursuit of the aforementioned purposes and in any case within the limits of the same and of provision of services relating to the current activities of said Data Controller, to public bodies for legal compliance, as well as to third parties and companies such as banks, credit institutions and companies strictly related to credit collection, legal and industry consultants and auditors, parties with administrative and contractual consultancy functions and third party suppliers of technical and IT support engaged in the proper and due pursuit of the described purposes. In any case, data processing by third parties will be performed lawfully and in compliance with the laws currently in force.

In order to better fulfil the marketing purposes, in addition to the above-mentioned parties, the data may also be disclosed to marketing services, profiling and statistical market research providers; also processing by such third parties must be carried out according to correctness and in compliance with the provisions of current legislation, subject to prior authorisation by the Data Controller.

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RETENTION TIMES

The personal data of data subjects will be kept for the time necessary to execute the relationships in place between the parties and in any case no later than ten years from termination of the existing relationship.

With reference to processing for the purposes of sending commercial and promotional communications on the services of the Data Controller and for sending information messages relating to its activity, as well as for marketing and profiling purposes, the data will be kept in compliance with the law, as also specified by the Authority for the protection of personal data, and in any case subject to objection to processing by the data subject. Objection to processing may be made by the data subject using any of the transmission methods.

In compliance with the provisions of the above mentioned provision, data processed in connection with promotional and/or commercial communications will be kept for a period not exceeding 2 years, while in relation to personal data used for profiling activities, the retention time of the same will not exceed 12 months.

RIGHTS OF THE DATA SUBJECT

The data subject may exercise his/her rights as provided for by articles 7, 8, 9 and 10 of Lgs. Decree no. 196. of 30 June 2003 by contacting the Data Controller. In particular, according to art. 7, the data subject has the right to obtain confirmation of the existence or otherwise of personal data related to him/her, including data that has not yet been recorded and to obtain that data in a clearly understandable form. The data subject has the right to obtain information regarding: a) the source of any personal data; b) the purposes and methods of processing; c) the logic applied in the event of electronic processing; d) identification details relating to the Data Controller, the data processors and the representative designated in compliance with article 5, paragraph 2; e) the subjects and categories of subjects to whom the personal data may be communicated or who may become acquainted with said data, in their capacity as data processors, persons in charge of data processing and appointed representatives in Italy. The data subject has the right to obtain: a) that said data is updated, amended and, if in the interest of the data subject, completed; b) that any data processed in violation of the law be cancelled, made anonymous or blocked, including any information that does not need to be held for the purposes for which it was collected or subsequently processed; c) receive confirmation that the operations in a) and b) have been made known, also as regards their content, to the parties to whom the data has been communicated or disclosed, except in cases where this is impossible or requires the use of means that are clearly disproportionate with the protected right. The data subject has the right to object, either in full or in part a), for legitimate reasons, to the processing of personal data relating to him/her even if relevant to the purposes it was collected for; b) to the processing of personal data relating to him/her for the purposes of delivering advertising material, direct sales, market surveys or for marketing communications.

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DATA CONTROLLER, DATA PROCESSORS AND PRIVACY COMMUNICATION

The Data Controller is **Altaeco S.p.A.**, with registered office in Via G. Pascoli 4/6, 20010 Vittuone, Milan (MI).

The updated list of data processors is available at the company's registered office. For any communication regarding articles 7 et seq of Lgs.D. no. 196/2003, as amended and supplemented, the Data Controller has provided the e-mail address privacy@altaeco.com

NATURE OF PROVISION

Provision of data with regard to the performance of contractual/pre-contractual relationships is mandatory for the obligations required and punished by law; otherwise, provision is optional but any refusal by the data subject shall prevent the Data Controller from proceeding with the relationship being established and its detailed execution.

Failure to provide the data necessary for marketing and profiling activities will not affect the pursuit of the main purpose.

CONSENT

Pursuant to art. 24, paragraph 1 of Lgs.D. 196/2003, as amended and supplemented, consent to the processing of such data for the purpose of establishing a contractual relationship between the data controller and the data subject is not necessary since it is collected in order to fulfil legal obligations and/or for execution of the obligations deriving from the existing contract or of the so-called pre-contractual obligations. Furthermore, consent for so-called Soft Spamming is not required.

pursuant to art. 23 of Lgs.D. 196/2003, consent to the processing of personal data is necessary with regard to the purpose of marketing and of profiling to be carried out as provided for in the section "processing purpose". It is pointed out that, in compliance with Provision 330 of 04 July 2013 of the Authority for the Protection of Personal Data, consent given for automated methods also extends to traditional ones. This without prejudice to the rights already expressed in this policy in the paragraph "rights of the data subject".

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PROVISION OF CONSENT

Having read the policy provided pursuant to and by effect of art. 13 of Lgs.D. no. 196/2003, as amended and supplemented, and of the processing purposes and methods, the data subject, aware that any lack of authorisation implies the impossibility for the data controller to proceed with processing subject to express and specific consent, in particular:

MARKETING ACTIVITIES

- I ACCEPT and consent to the aforementioned processing. In this case, the Data Controller will proceed to use the personal data collected for marketing purposes.
- I DO NOT ACCEPT and DO NOT consent to the aforementioned processing. In this case, the marketing activities will NOT be carried out.

PROFILING ACTIVITIES

- I ACCEPT and consent to the aforementioned processing. In this case, the Data Controller will proceed to use the personal data collected for profiling purposes.
- I DO NOT ACCEPT and DO NOT consent to the aforementioned processing. In this case, the profiling activities will NOT be carried out.

Place and Date _____

Signature (legible) of the data subject _____

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