

**Subject: Information for customers and suppliers released by Promotec S.r.l. under art. 13,  
Italian Legislative Decree 196/2003**

The new privacy policy, pursuant to art. 13, Italian Legislative Decree 196/2003, is issued following amendments introduced by Law Decree no. 201 of December 6, 2011, which made significant changes to some existing regulations.

This new privacy policy updates all previous versions released before.

It is therefore stated that:

- 1) pursuant to the establishment of a commercial relationship and during its course, our company will gather and process your personal data;
- 2) for the sake of clarity, we hereby specify the following definitions pursuant to L. D. 196/2003:

**Processing:** any operation, also when carried out without any use of electronic devices, concerning the gathering, recording, organizing, keeping, consulting, elaboration, change, selection, extracting, comparison, usage, interconnection, blockage, communication, dissemination, cancellation and destruction of data;

**Personal data:** any information related to a natural person, which is identified or identifiable, even indirectly, by reference to any other information, including a personal identification number;

Therefore, pursuant to L. D. 196/2003,

**we inform you**

that the collection and processing of your personal data will be carried out by this company in compliance with the following:

- a) **purpose:** your data will be processed in order to correctly carry out accounting, tax, commercial, technical duties and in general for all company activities pertaining the existing relationship;
- b) **advertising purpose:** your data can be also used, subject to your specific and explicit agreement, for sending advertising material/communications by mail, e-mail, fax, sms and the alike; after having expressed your agreement, however, it is your right to oppose, at any time and with no expense, processing your data for this purpose;
- c) **ways and means:** your data shall be processed both with paper and electronic/IT/tlc means/media, in full compliance with law provisions, according to the principles of lawfulness and correctness and in such a way as to protect your privacy;
- d) **optional communication:** data communication is optional and not compulsory;
- e) **consequences of any denial:** however, any denial to supply data or the thorough opposition to their processing may entail the impossibility to continue any commercial relationship, or any other kind of relationship, with our company; nonetheless any denial to the use of data for sending advertising material/communications shall not have any whatsoever consequence on our present or future relations;

- f) **subjects or categories to whom data may be communicated or disseminated:** your data may be communicated to third parties only in compliance with legal or contract-related obligations. In no case will such data be disseminated;
- g) **company managers and appointees charged with data processing:** your data shall be exclusively processed by company managers and appointees within the administration and commercial departments;
- h) **rights of the interested party:** the interested party is entitled to all rights provided under art. 7, which is reproduced in its entirety below, and constitutes an integral part of this informative report.
- i) **data controller:** data controller is Promotec S.r.l., with registered office in Anzola Emilia (BO), Via Emilia 41/b, in the person of its acting legal representative;
- j) **data processor:** the person responsible for contacts with the interested party is Mr. Juri Torreggiani, with registered office in Reggio Emilia, Via Piccard n. 16/G, tel. +39 0522/38.28.11, fax +39 0522/38.79.96: any request for clarifications or information can be addressed to this professional in charge. The complete and constantly updated list of the persons in charge can be found and consulted in the company website and/or in the appropriate paper document which is kept at the registered office.

This information report may be supplemented, orally or in writing, with further elements or indications, in order to better satisfy any knowledge need in matters of "Privacy" and to comply with the regulatory evolution.

Date: June 5, 2014

Data controller  
Promotec S.r.l.

#### **Art. 7 L. D. 196/2003 (Right of access to personal data and other rights).**

1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning him/her, even if not yet registered, and to have them communicated in intelligible form.
2. The interested party has the right to obtain indication: a) of the origin of the personal data being processed; b) of the processing purposes and procedures; c) of the criteria applied in case of processing with use of electronic instruments; d) of the details identifying the controller, the persons in charge and the representative designated as per article 5, par. 2; e) of the subjects or categories of subjects to whom personal data may be communicated or who may come to know them in their quality as designated representatives in the state's territory, as persons responsible or in charge.
3. The interested party has the right to obtain: a) the updating, correction of his data or, when he has an interest to it, their supplementation; b) the cancellation, transformation to anonymous form, or blockage of data processed in violation of the law, included those whose conservation is not required with regard to the purposes of their gathering or processing; c) documentary evidence that the operations under a) and b) have been made known – also in relation with their content – to the persons to whom said data have been communicated or disseminated, except for the case when such fulfillment appears to be impossible or requires a clearly disproportionate use of means compared with the protected right.
4. The interested party has the right to oppose, wholly or partly: a) for lawful reasons, the processing of personal data concerning him/her, even though relevant to the purpose of their being gathered; b) the processing of personal data concerning him/her for the purpose of sending advertising or direct-sale material, or in order to carry out market research or commercial communications.