	Date: March 14, 2018
	BUSINESS CONFIDENTIAL
	Privacy Policy

Turin, 14/03/2018

Information according to Section 13 of Legislative Decree no.196 of 30.06.03
"Personal Data Protection Code"
Information to customers and suppliers


In compliance with Section 13 of Legislative Decree no. 196 of 30.06.03 "Personal Data Protection Code", Feedback Italia S.r.L., hereinafter referred to as Feedback Italia and/or the Data Controller, is required to provide you with the following information regarding the processing of your personal data:

- Data are collected for contractual, commercial, statistical, promotional purposes, for commercial reference purposes as well as for market research;
- Data processing is performed by electronic and magnetic means or on paper;
- Your data provision is mandatory to fulfill all accounting, legal and contractual obligations;
- Additional to the communication and distribution of data as required by the applicable law, data may be supplied to the following entities: company's employees within their field (sales, production, administration), companies controlled or affiliated to Feedback Italia, located in Italy or abroad, company's sales representatives, factoring companies, credit collection companies, credit insurance companies, financial institutions, leasing companies, professionals and consultants, data processing companies, commercial information companies and transport companies for commercial reference purposes, market researches and statistical purposes;
- Data shall be processed for the whole duration of our contractual relationship and also afterwards in order to comply with all legal obligations;
- The Data Subject can exercise the rights referred to in Section 7 of Legislative Decree no. 196 of 30.06.03;
- The Data Controller and the Data Processor is Feedback Italia S.r.L., based in Via J.F.Kennedy 10 - 10024 Moncalieri (TO), e-mail: infos@feedbackitalia.it;

For your convenience, please find below the abstract of Legislative Decree no. 196 of 30.06.03.

Best regards

Feedback Italia S.r.L.

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Attached to the information

1. ART.13 – INFORMATION TO DATA SUBJECTS: 1. The data subject as well as any entity from whom or which personal data are collected shall be preliminarily informed, either orally or in writing, as to: a) the purposes and modalities of the processing for which the data are intended; b) the obligatory or voluntary nature of providing the requested data; c) the consequences if (s)he fails to reply; d) the entities or categories of entity to whom or which the data may be communicated, or who/which may get to know the data in their capacity as data processors or persons in charge of the processing, and the scope of dissemination of said data; e) the rights as per Section 7; f) the identification data concerning the data controller and, where designated, the data controller's representative in the State's territory pursuant to Section 5 and the data processor. If several data processors have been designated by the data controller, at least one among them shall be referred to and either the site on the communications network or the mechanisms for easily accessing the updated list of data processors shall be specified. If a data processor has been designated to provide responses to data subjects in case the rights as per Section 7 are exercised, such data processor shall be referred to.

2. The information as per paragraph 1 shall also contain the items referred to in specific provisions of this Code and may fail to include certain items if the latter are already known to the entity providing the data or their knowledge may concretely impair supervisory or control activities carried out by public bodies for purposes related to defence or State security, or else for the prevention, suppression or detection of offences.

3. The Garante may issue a provision to set out simplified information arrangements as regards, in particular, telephone services providing assistance and information to the public.

4. Whenever the personal data are not collected from the data subject, the information as per paragraph 1, also including the categories of processed data, shall be provided to the data subject at the time of recording such data or, if their communication is envisaged, no later than when the data are first communicated.


5. Paragraph 4 shall not apply: a) if the data are processed in compliance with an obligation imposed by a law, regulations or Community legislation; b) if the data are processed either for carrying out the investigations by defence counsel as per Act no. 397 of 07.12.2000 or to establish or defend a legal claim, provided that the data are processed exclusively for said purposes and for no longer than is necessary therefor; c) if the provision of information to the data subject involves an effort that is declared by the Garante to be manifestly disproportionate compared with the right to be protected, in which case the Garante shall lay down suitable measures, if any, or if it proves impossible in the opinion of the Garante.

5-bis. The information as per paragraph 1 shall not be necessary in case CVs are received that are sent voluntarily by the relevant data subjects with a view to recruitment for job positions. When first contacting a data subject that has sent his/her CV, the data controller shall be required to provide such data subject, also verbally, with a short information notice that shall include at least the items mentioned in paragraph 1, letters a., d., and f. . [Paragraph added by Section 6(2)a, item 2. of decree no. 70 dated 13 May 2011 as converted, with amendments, into Act no. 106 dated 12 July 2011]

2. ART.4 – DEFINITION: "[...] **b) <personal data>** 'personal data' shall mean any information relating to natural or legal persons, bodies or associations that are or can be identified, even indirectly, by reference to any other information including a personal identification number; **c) <identification data>** 'identification data' shall mean personal data allowing a data subject to be directly identified; **d) <sensitive data>** 'sensitive data' shall mean personal data allowing the disclosure of racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade-unionist character, as well as personal data disclosing health and sex life;

3. ART.4 – DEFINITIONS: "[...] **f) <Data Controller>**, 'data controller' shall mean any natural or legal person, public administration, body, association or other entity that is competent, also jointly with another data controller, to determine purposes and methods of the processing of personal data and the relevant means, including security matters; **g) <Data Processor>**, 'data processor' shall mean any natural or legal person, public administration, body, association or other agency that processes personal data on the controller's behalf; **h) <persons in charge of the processing>**, 'persons in charge of the processing' shall mean the natural persons that have been authorized by the data controller or processor to carry out processing operations;

4. ART.7 – RIGHT TO ACCESS PERSONAL DATA AND OTHER RIGHTS: "1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their being already recorded, and communication of such data in intelligible form; 2. A data subject shall have the right to be informed: a) of the source of the personal data; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if the latter is carried out with the help of electronic means; d) of the identification data concerning data controller, data processors and the representative designated as per Section 5(2); e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.; 3. A data subject shall have the right to obtain: a) updating, rectification or, where interested therein, integration of the data; b) erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c)

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certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected; **4.** A data subject shall have the right to object, in whole or in part: a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection; b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys;

5. ART.25 – BANS ON COMMUNICATION AND DISSEMINATION: “**1.** Communication and dissemination shall be prohibited if an order to this effect has been issued by either the Garante or judicial authorities, as well as: a) with regard to personal data that must be erased by order, or else upon expiry of the term referred to in Section 11(1), letter e), b) for purposes other than those specified in the notification, whenever the latter is to be submitted; **2.** This shall be without prejudice to communication and dissemination of the data as requested, pursuant to law, by police, judicial authorities, intelligence and security agencies and other public bodies according to Section 58(2), for purposes of defence or relating to State security, or for the prevention, detection or suppression of offences;

6. ART.4 – DEFINITIONS: “[...] **a)** <processing> ‘processing’ shall mean any operation, or set of operations, carried out with or without the help of electronic or automated means, concerning the collection, recording, organisation, keeping, interrogation, elaboration, modification, selection, retrieval, comparison, utilization, interconnection, blocking, communication, dissemination, erasure and destruction of data, whether the latter are contained or not in a data bank; [...]; **l)** <communication> ‘communication’ shall mean disclosing personal data to one or more identified entities other than the data subject, the data controller’s representative in the State’s territory, the data processor and persons in charge of the processing in any form whatsoever, including by making available or interrogating such data; **m)** <dissemination> ‘dissemination’ shall mean disclosing personal data to unidentified entities, in any form whatsoever, including by making available or interrogating such data; [...]

NOTE:

This document was drawn up the first time on 22 April 2004 and is controlled and modified annually. The last update was made on March 14, 2018.