

PRIVACY INSTRUCTIONS - Data Protection Policy

Report on personal data processing, according to article 13, D.Lgs. June 30, 2003, No.196

In compliance with what expressed by D.Lgs. June 30, 2003, No.196 (Privacy Consolidation Act), we hereby supply you all due information concerning the purposes and methods for your personal data processing, that will be processed on the basis of the principles of fairness, lawfulness and clarity to safeguard your privacy and rights.

Purposes of data processing

-For activities that are strictly connected and critical to customer care relationships (e.g. acquisition of preliminary data at the conclusion of a contract, performance of operations according to the commitments included in the contract stipulated with the customers, etc.);
-Informative activities;-Business activities;-Goods and services supply; -Accounting operations (to issue invoices, to effect payments).

Methods of data processing – Data Retention

The data processing will be carried out automatically and / or manually, by authorized personnel, with means and methods that will guarantee maximum security and confidentiality. The data will be kept for a period not exceeding the purposes for which the data were collected and subsequently processed.

Ambit of communication and diffusion

Your processed data will not be diffused. It could instead be conveyed to societies related and / or associated to SOCHIM International, abroad and within legal boundaries to third parties belonging to the following categories:

Suppliers of services related to the management of the informative system used by SOCHIM International, and networks (including email);

- Suppliers of services related to the acquisition, registration and processing of data taken from documents, or supports supplied and created by the clients with the object of massive operations related to payments, effects, cheques and other titles;
- Suppliers of services related to the transmission, enveloping, transport and delivery of communications for the clients;
- Suppliers of services related to the customer care (e.g. call center, help desk etc.);
- Studies and societies in the ambit of assistance and consultancy;
- Subjects that carry out operations of control, revision and certification of the activities performed by SOCHIM International, even in the customers' interests.

The subjects belonging to the above categories are to be considered Responsible for the data processing, or as acting independently as distinct Titulars for the data processing. The list related to these subjects, constantly updated, is available at SOCHIM International. Any further communication and diffusion will be subject to your previous approval.

Nature of underwriting

Your data underwriting is optional, in absence of which, SOCHIM International, might find it impossible to supply the services, necessary to contractual, accounting and fiscal obligations.

The titular also notifies that, any missing or incorrect communication of the obligatory information might mainly cause the following consequences:

- The impossibility for the titular to guarantee the respect of the contractual agreements related to the data processing;
- The possible incompatibility of the data processing results with the fiscal and administrative regulations or with the operations for which the data is required;

You can claim your rights according to art. 7,8,9 and 10 of D.Lgs. June 30 2003 No.196, applying to the titular (or to the Responsible subject, if mentioned) of the data processing.

Lastly, we inform that art.13, of the here referred-to law, provides the interested persons with the possibility to claim specific rights. Moreover, the interested person can obtain from the data processing Titular:

- The acknowledgment of the existence or non-existence of data pertaining to him, even if not yet registered, and the request that the data be made available to him in an intelligible form;
- To be informed about the data source, as well as the processing logic and purposes;
- The cancellation, the transformation in an anonymous form or the amount of data being processed in violation of the law, as well as the data updating, correction or implementation.

For legitimate reasons, the interested person can also object to the processing of his own data, especially in those cases where data is conveyed for business reasons or advertising material despatch, direct sales or marketing research.

To this end, specification is hereby made that the data processing officer in our case is the Company, in the person of our legal representative, Pursuant to the terms and conditions of Section 29 of the Consolidated Data Protection Act, the Company has designated Mr. Emilio Sestagalli as its data processing manager, who may be consulted for the exercise of statutory rights pursuant to Section 7 of Legislative Decree n° 196/2003, by contacting our registered offices to the direct mail sestagalli@sochim.it

Session **cookies** used to expedite the analysis of internet traffic and user access to on-site services do not contain personal data, and no user tracking systems are used.

Section 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) 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.

The data processing Titular is SOCHIM International SpA, Via Ghisolfa 86 – 20010 Cornaredo, Milan, Italy
Responsible for the privacy policy for SOCHIM International SpA is Mr. Emilio Sestagalli. For information contact on direct mail: sestagalli@sochim.it

Date and place

The Titular

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