

Re: INFORMATION pursuant to Article 13 of the Privacy Code (Legislative Decree no. 196 dated 30 June 2003)

Dear Sirs and Madames,

We inform you that pursuant to Article 13 of the aforesaid Legislative Decree, containing the Consolidated Law on the protection of persons and other subjects with regard to the processing of personal data (hereinafter the Code), the information and data that you leave in the mailing list box shall be processed in compliance with the aforesaid provisions and said processing shall be based on the principles of necessity, correctness, lawfulness and transparency and protection of your confidentiality and of your rights.

“Personal data” means, pursuant to the Code, *“any information relating to an individual person, legal entity, corporation or association, identified or identifiable, even indirectly, through reference to any other personal information, including a personal identification number.”*

“Processing” means *“any operation or series of operations, even performed without the aid of electronic means, concerning the collection, recording, organisation, conservation, consultation, elaboration, modification, selection, extraction, comparison, use, interconnection, freezing, communication, disclosure, deletion and destruction of data, even if not recorded in a database”*.

Article 13 of the Code provides that, as part of the aforesaid personal data protection, the Company must provide the subjects to whom the personal data refers (defined by the law as “data subjects”), prior to establishing the contractual relationship or prior to processing data already obtained, oral or written information concerning:

- a. the purposes and procedures of the processing to which the data is destined;
- b. the obligatory or optional nature of disclosure of the data;
- c. the consequences of refusal to reply;
- d. the subjects or categories of subjects to which the personal data may be disclosed or who may come to acquire knowledge thereof in the capacity of data processors or persons in charge of processing and the scope of disclosure of said data;
- e. the rights set forth in Article 7;
- f. the personal details of the data controller and, if appointed, the representative on the state territory pursuant to Article 5 and the data processor.

The same Article 13, in point 4, provides that when personal data is collected from the data subject, the information referred to in point 1, inclusive of the categories of data processed, must be provided to the data subject at the time the data is recorded or, if said data is to be disclosed to third parties, no later than the first disclosure.

In relation to the above, we inform you of the following:

Purposes of processing

Information that you provide will be processed by us, for the exclusive purpose of verifying accesses, and subsequently verifying the awareness of the information contained in Lechler Safety Sheets, in addition to sending marketing communication.

Processing procedures

The data that you provide us with shall be processed through electronic or paper processing by persons specially appointed by the data controller. Both the information systems and the paper media are managed and stored in such a way as to guarantee the data's security and the confidentiality.

Scope of disclosure of your data

The following categories of subjects may come to acquire knowledge of your data, in the capacity of data processors or persons in charge of processing, appointed by the undersigned LECHLER S.p.A., data controller:

- Safety staff;
- Marketing staff;
- IT department staff.

Communication and/or disclosure of data

The personal data that you provided shall not be communicated and/or disclosed to any third party category.

Rights set forth in Article 7

Below we transcribe the full contents of Article 7, containing all your rights concerning personal data.

- 1) *The data subject is entitled to obtain confirmation as to whether or not personal data is held, even if not yet recorded, and to have said data transmitted in intelligible form.*
- 2) *The data subject is entitled to obtain specification:*
 - a) *of the source of the personal data;*
 - b) *of the purposes and procedures of processing;*
 - c) *of the logic applied in the case of processing performed using electronic tools;*

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- d) *of the details of the data controller, processors and representative appointed pursuant to Article 5, sub-section 2;*
 - e) *of the subjects or categories of subjects to whom the personal data may be disclosed or who may come to acquire knowledge thereof in their capacity as representative appointed in the state territory, data processors or persons in charge of processing.*
- 3) *The data subject is entitled to obtain:*
- a) *the updating, correction, or, when necessary, integration of data;*
 - b) *the deletion, transformation into anonymous form or freezing of data processed in breach of the law, including data that does not need to be conserved in relation to the purposes for which it was collected or subsequently processed;*
 - c) *confirmation that the operations referred to in letters a) and b), and their content, have been brought to the attention of those to whom the data has been communicated or disclosed, unless fulfilment of this obligation proves impossible or entails an employment of resources that is clearly disproportionate to the protected right.*
- 4) *The data subject is entitled to fully or partially object:*
- a) *for legitimate reasons, to the processing of personal data, even if pertinent to the purpose of collection;*
 - b) *to the processing of personal data for the dispatch of advertising or direct sales material or for the conduction of market research or business information.*

Data controller

The data controller is LECHLER S.p.A., with registered office in Via Cecilio 17, Como.

Yours faithfully.

Lechler S.p.a.
by proxy