

## **Note pursuant to art. 13 of Law decree 196 of 30.6.2003**

### **“Protection of people and of other individuals with regard to the treatment of personal data”**

On the subject of the protection of personal data, the Code, adopted with legislative decree 196 of 30 June 2003 and following modifications and integrations (referred to as “the **Code**” further on), compels those who are defined as “**holders**” of the treatment of personal data, in accordance with article 4 of the same law, to provide all interested parties with exact information on the possible treatment of their personal data.

Therefore, being responsible for the treatment of personal data, **SEVEN** is willing to provide all requested information in detail, with reference to the treatment of personal data as regulated by the Code (below referred to as “**Data**”).

SEVEN is a registered company under Italian law whose legal residence is in via Alfredo Piatti, 15 – 24125 Bergamo.

All data directly collected by SEVEN from the interested party may be treated in compliance with the above-mentioned norm and the secrecy duties that SEVEN has to attend to.

#### Browsing data:

- Computer systems designated for the operativity of website/s [www.sevenfiduciaria.com](http://www.sevenfiduciaria.com) automatically receive some personal data on a daily basis, which are implicitly transmitted when using web communication protocols. Should they be processed with data held by third parties, these data might identify users/visitors (for example: IP address and names of computer domains used by users/visitors who go to [www.sevenfiduciaria.com](http://www.sevenfiduciaria.com)).
- These personal data are normally collected for statistical studies, anonymously managed and used to facilitate browsing through the website [www.sevenfiduciaria.com](http://www.sevenfiduciaria.com).

#### Cookies<sup>1</sup>:

- the website [www.sevenfiduciaria.com](http://www.sevenfiduciaria.com) also uses cookies (short strings of text which are sent from the website server to the browser of the website user/visitor and are automatically saved on the computer by the user/visitor).
- Cookies make internet-surfing more practical and almost all browsers are set up so that they can accept them. Of course users/visitors can modify the configuration of their browser and block cookies (opt-outs): however, we must point out that, should the system block, the operativity of the website [www.sevenfiduciaria.com](http://www.sevenfiduciaria.com) and the use of some services may be limited, especially for services requiring registration.

### 1. TREATMENT PURPOSE

Data can be treated by SEVEN in digital or printed form, for the following purposes:

a) collecting information previous or subsequent to a contract that has been signed, including the economic-financial evaluation of risks or non-patrimonial legal relationships; performing duties deriving from the contractual relationships established; correct management of the contractual relationship and relative duties; administrative-accounting purposes (as stated by art. 34, clause 1-ter, of Legislative

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<sup>1</sup> **Technical notes:** There are “session” cookies (which are useful during authentication or for registration-only services and are deleted upon closing the browser); and “persistent” cookies, which remain on the hard disk until they expire. They are especially used to facilitate website-browsing, to understand which sections produced a certain number of pages and users and to provide advertising formats.

decree 196/2003); managing fax or e-mail communication for activities which are closely connected and necessary to fulfill existing mutual duties;

b) performing duties provided by the law, by regulations and by the EU, or orders provided by Authorities and supervisory boards or even administrative procedures;

c) purposes suitable for the business run by SEVEN, included but not limited to:

- evaluating customer satisfaction on the quality of services, through live or phone interviews, questionnaires, etc.;
- market studies and research;
- informative, statistical or scientific activities;

Data transfer for the purposes listed at letter c) is optional and any refusal of consent does not imply any consequences. Moreover, should the interested party refuse, SEVEN or other European companies might not be able to keep it up-to-date on events, presentations of new products or services etc, and the interested party might not be able to receive publications or other informative materials that it may find interesting.

Data can only be accessed by members of SEVEN who need to view them because of their business or tasks, included but not limited to: those who are responsible for external communications and communication with customers, market supervision, accounting, secretaries, directors and management at SEVEN. These individuals, whose number is as limited as possible, carry out the treatment of data acting as "treatment officers" and are especially named and trained to avoid losses, destruction, unauthorized accesses or the unpermitted treatment of data.

The treatment holder is Seven Fiduciaria, located in Bergamo in Via Alfredo Piatti, 15, in the person of the pro tempore legal representative.

The officer in charge for the treatment at SEVEN is the legal representative, whose task is to reply to any request related to the treatment of personal data. He is the holder of the updated list of all other internal and external officers and works in the offices of SEVEN.

## 2. DATA TRANSMISSION TO THIRD PARTIES

SEVEN can transmit data for the same purposes for which they were collected to:

a) Authorities and Surveillance and control bodies, or other individuals indicated by them, on the grounds of provisions issued by them, or set by laws, even from the EU, by regulations or by administrative procedures;

b) third parties, whose contribution is key to SEVEN for purposes which are closely interrelated and connected with those listed at point 1, letter a) and precisely:

- banks and financial companies, professionals, external companies for the implementation of services, including debt collection officers;
- individuals who deal with printing, packaging and delivering direct communications to the interested parties;
- suppliers of technological and computer services.

Names and addresses of these individuals are available by request of the interested parties;

c) third parties who carry out activities related to the purposes listed at letter c) of point 1.

- individuals who deal with valuating customer satisfaction on the quality of services;
- individuals who deal with informative, statistical or scientific activities;
- individuals who deal with promoting and/or selling products and services;
- individuals who deal with market studies and research;
- individuals who deal with public relations' activities;
- companies or bodies managing Italian or foreign markets with which one or more European companies make alliances and/or collaborate, as well as third parties, whose contribution is availed of by bodies or companies.

d) suppliers of services to SEVEN;

The names and addresses of these individuals are available by request of the interested parties;

Withstanding what is stated at letter c), clause 3 of point 1, which was reported above, the consent relative to letter c) is optional and any refusal to it does not imply any consequences. Moreover, in case of refusal by the interested party, it might not be possible for SEVEN to keep it up-to-date on events, presentations of new products or services, etc., and the interested party may not receive publications or other informative materials of interest.

### 3. DATA TRANSFER ABROAD

The data of the interested party can also be transferred abroad, even outside the European Union, to the same individuals who are mentioned at point 2, for the same purposes listed at the aforementioned point 1, with or without the aid of electronic or automated media.

Giving consent is optional with regard to international transfers for the purposes listed at point 1, letter c) and any refusal to it does not imply any type of consequences. Moreover, in case of refusal by the interested party, it may prove to be impossible for SEVEN to keep it up-to-date on events, presentations of new products or services etc., and for the interested party to receive publications or other informative materials that might be of interest.

### 4. TREATMENT MODALITIES

SEVEN treats the data of the interested parties in compliance with the law, in accordance with the principle of fairness, so to ensure privacy and safety – including the collection and any other operation that can be traced back to the definition of “treatment” in accordance with art. 4 of the Code (included but not limited to the registration, processing, communication, storage and distribution of data) – it is carried out by manual, computer and/or telematic instruments, with organizational modalities and by following methods which are closely related to the above-mentioned purposes.

SEVEN does not record phone conversations, apart from those addressed to and coming from the office, that might be recorded, upon warning customers, exclusively for reasons connected with the clarity of the transactions requested/implemented. Recordings are filed by reserved access and under no circumstances can they be given to individuals with no explicit authorization.

Data are stored for the time necessary for the purposes for which they were collected, in accordance with the law and with any other provision by the Authority. According to art. 24, letter *i-ter*) of the Code, no consent is requested when the treatment regards the transmission and exchange of data among companies belonging to the same group (controlling, controlled or interrelated in accordance with art. 2359, of the Civil code, or subject to common control) and among unions, business networks, groups and business associations, even temporary ones, if transmission and exchange are performed for the following administrative-accounting purposes: purposes connected with the implementation of internal organizational activities; purposes suitable for fulfilling contractual and pre-contractual duties, managing the professional relationship in all of its phases, bookkeeping and applying norms about taxes, unions, welfare and assistance, health, hygiene, work health and safety. (art. 34, of the Code).

### 5. EXERCISING RIGHTS

The law provides that all interested parties must be informed of the rights that they can exercise according to the law. The list of these rights is included in article 7 of the law; it also provides that the interested party can request access to his data, have a copy of the information treated and, under the right circumstances, their update, adjustment, integration, deletion or block, and partly or completely oppose the treatment of data related to it for legit reasons.

The interested party can contest the above-mentioned rights by addressing the owner or treatment officer of SEVEN, according to the modalities provided by the law, as identified above.

This informative note was updated in the month of March 2014.

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