

SIT SPA

**LEGAL NOTICES
AND PRIVACY POLICY
WWW.SITGROUP.IT**

Vers.1/2013

www.sitgroup.it

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INTRODUCTION

The purpose of the Legal Notices and Privacy Policy is to ensure that you, the User, can verify in full transparency the processing of your data on the web and to highlight the importance we place on the protection of User rights and on compliance with legal provisions. This document complies with the latest standards set out by European directives and adopted into Italian legislation by Legislative Decree 69/2012, including provisions relating to traditional and web marketing. The Company SIT S.p.A., as the business data controller, and as owner of this domain and website, herewith provides Users connecting to www.sitgroup.com with certain rules governing the correct and authorized use of photographs, images, text and any other document published herein. The Legal Notices are subdivided into different sections that identify the applicable regulatory frameworks referred to by the Company. In addition, the term ***Business Data is given to refer to any kind of information processed, acquired, known, communicated or extracted in the pages of www.sitgroup.it, including information from the websites and portals owned by the data controller.*** It is important to emphasize that this document may be subject to revision and supplementation by the Company whenever opportune conditions arise. In this regard, and for purposes of transparency towards the user, the heading cover page carries the number corresponding to the current applicable version of the document (*currently version 1/2013*). The Legal Notices also describe the User's rights of navigation governed both by the Privacy Code and by subsequent laws in such a way as to unify the current forms of protection in relation to relevant circumstances.

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PROTECTION OF TRADEMARKS AND INTELLECTUAL PROPERTY RIGHTS

SIT S.p.A represents not only the name of the company but also its trademark, which is used widely together with its corresponding logo on paper, on the web and in the digital world in various marketing activities.

Legal protection is here also extended to the domain according to recognition granted by the legislature under the new Industrial Property Code (Legislative Decree 30/2005). Indeed, the new legislative framework provides for domain name protection against acts of counterfeiting and piracy by third parties under both ordinary and precautionary jurisdiction. In particular, Article 133 of the Intellectual Property Code allows for the judicial authority to provide for the prohibition of use of a domain illegally registered, or for its temporary transfer, when appropriate, subject to the provision of adequate guarantees by the beneficiary of the measure.

In the light of the foregoing, the website and its contents are the exclusive property of the Company. However, it is our duty to point out that there are some images or publications within the website whose copyright does not belong directly to the Company, for which rights of use are however possessed (in particular in reference to the contents of certain websites of our partners). In this regard, the concerned party is informed about the purposes of processing the data and gives us explicit and free consent. It is to be noted that it is forbidden to copy, download or reproduce all or part of the contents published on the website unless expressly permitted to do so.

In addition, any use by third parties of the images present on the website that is non-conforming and may result in the publication of untruthful, falsified or injurious messages affecting the dignity, reputation or privacy of the concerned party is prohibited. The Company reserves the right to take legal action in relation to any of the aforementioned offences. The User is therefore only authorized to view the site and to perform those temporary actions of economic insignificance that are considered transitorily or accessorially integral or essential to viewing the website www.sitgroup.com and its contents and to other navigation operations performed exclusively for legitimate use.

Copyright protections apply in particular to the website and its links to the Company's own pages on social networks.

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Regarding regulations in relation to **links**, it is stated that the current version of the Legal Notices refers to links to external sites with which the Company has collaborations.

In cases of any external links, not owned by the Company, SIT S.p.A. does not control or perform any monitoring of related websites and their content and therefore may not be held liable for the content of these websites and the rules they have adopted, including with regard to privacy and the processing of personal data during navigation.

The Company considers as legitimate '**surface linking**', that is, traditional links that transfer the User to the home page of another site, whereas '**deep linking**' and '**framing**' are not permitted and are potentially subject to respective liability for breach of copyright and unfair competition.

INFORMATION TRANSPARENCY AND COMPLETENESS

SIT S.p.A. guarantees transparency and comprehensive and accurate communication with all those it interacts with.

Given information complies with the standards of clarity and truthfulness enshrined in the discipline of transparency towards the User and customer and in full compliance with the principles of consumer protection.

INFORMATION CONFIDENTIALITY

SIT S.p.A. is committed to ensuring the adequate privacy and security of data through the development of specific internal control programs and well-defined policies. Security measures are implemented both for paper and electronic management. It is our established practice to acquire consent for the processing of personal data prior to the issue of informative material, particularly in relation to marketing and communication activities carried out by the Company.

The data relating to user information collected on the website are handled and accessible only by the Company and its internal staff on specific written appointment in accordance with legislation on data processing. No action is made to distribute such data to third parties.

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PRIVACY POLICY

This page details the management of the website concerning the processing of its users' personal data. This notice is addressed to, pursuant to Article 13 of Legislative Decree 196/2003 (the 'Privacy Code') and subsequent amendments, all those interacting with the SIT S.p.A. website.

The notice concerns only the website www.sitgroup.it and not other websites that may be accessed by users via links.

The notice also refers to that stated in Recommendation No. 2/2001 that the European Data Protection Authorities, in the vestige of the Work Group established by Article 29 of Directive No. 95/46/EC, adopted on 17/05/2001 in order to identify certain minimum requirements for the collection of personal data online, in particular, the methods, times and nature of the information that data controllers must provide to users when they connect to web pages, regardless of the purpose of the connection, subject also to the provisions of European directives and Italian legislation on data security.

In addition, the information contained on the website also meets the requirements of compliance with other regulatory provisions updated in accordance with Law No. 88 of July 7, 2009 in implementation of the 2008 European Community Legislation regarding fiscal matters, as well as with other recent provisions of Italian legislation transposing European Directives.

CUSTOMER DATA

Within this context, the term *customer data* is given to mean the set of information freely submitted by the user/customer or potential user/customer in appropriate forms on the website www.sitgroup.com. Such data may also include some identifying elements relating to ordinary and legal email addresses, mobile phone numbers and place addresses required to complete the sales process or register the interest of the customer. The type of information acquired refers only to what is contained in the corresponding sessions of the website www.sitgroup.it; no data is processed or stored differently from what is published online.

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DATA CONTROLLER

For the purposes of the principles of transparency and fairness enshrined in the Privacy Code, the data is to be processed directly by the data controller SIT S.p.A., whose complete identifying information is reported on the home page of the website. The domain is legally registered to and owned by the same data controller.

DATA PROCESSING SITE

The processing of data related to the web services of this website is carried out at the legally registered office of the data controller, who is responsible for making certain graphical modifications, as well as for managing, checking and updating articles and sales data. For the purposes of transparency, it is to be noted that the domain is supported by an external provider with operational and security responsibilities for which, in case of any violation, the provider may be subject to liabilities as dictated by specific sector regulations.

DATA TYPES

Navigation data

Computer systems and software procedures for the operation of this website acquire, during normal operation, certain personal data whose transmission is implied in the use of internet communication protocols.

This category of data includes the IP addresses or domain names of the computers used by the users connecting to the website, the Uniform Resource Identifiers (URI) of requested resources, the numeric code indicating the response status of the server (e.g. success, error) and other parameters related to the operating system and the user's computer environment. Such data may be used to attribute liability in the event of any offences committed against the website.

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Data provided voluntarily by the User

The optional, explicit and voluntary sending of emails to addresses indicated on the website entails the consequent acquisition of the address of the sender necessary to respond to any requests, as well as of any other personal data included in the email message.

This type of information is, in any case, of a common personal nature as defined by Article 4 of Legislative Decree 196/2003 and is handled only by the data controller by paper or electronic means. The processing of this data shall be exclusively connected to the purpose of responding to the information indicated by the users or of completing the ordinary sale of the product, and the data in no way communicated or disseminated to third parties.

Regarding data storage, the data shall be kept only for the relative time necessary and shall subsequently be deleted. In the event of any other relations with the user, it is our duty to request consent for use of the e-mail address for commercial communications and/or information in general. The information provided is acquired and managed exclusively by the Company in compliance with the principles of data integrity and confidentiality. With the exception of certain marketing operations, customer data is used exclusively for the purposes and activities related to the computer services provided by the Company.

COOKIES

No personal data concerning users is acquired by the website in this regard.

No cookies are used for the transmission of information of a personal nature, nor are any so-called 'persistent' cookies of any kind used, e.g. for tracking users. The use of session cookies (which are not stored on a long-term basis on the user's computer and are eliminated when the browser is closed) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) required to allow secure and efficient browsing of the website.

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OPTIONAL NATURE OF THE DATA PROVISION

Apart from that specified in relation to navigation data, the User is free to provide personal data by writing to the e-mail address indicated in the box for requesting information or for other communications. For the sake of completeness, it should be noted that in certain cases not subject to the ordinary management of the website, authorities may require notifications and information pursuant to Article 156 of Legislative Decree 196/2003, for the purposes of verifying the proper processing of personal data, which is mandatory under penalty of administrative sanctions. In the case of submission of a curriculum vitae, the User is required to indicate consent to the processing of the data contained in the document in order to allow the Company to correctly acquire the data and any manifestation of interest.

SOCIAL NETWORK DATA

SIT S.p.A. states that no processing of the data on the Facebook page of the Company is performed, except for information strictly relating to the click necessary for connecting to the social network page. No operation regarding the traceability of the User's personal data is performed. Consequently, SIT S.p.A. may not be held liable for any processing deriving from the technical characteristics of Facebook, for which reference is to be made to that website for related information.

RIGHTS OF DATA SUBJECTS

Each data subject has the right at any time to obtain confirmation of the existence of data relating to him/her, to know its content and source, to verify its accuracy or to request its amendment, updating or rectification, pursuant to Article 7 of Legislative Decree 196/2003. Similarly, each user has the right to revoke any prior consent granted for information or marketing purposes. Pursuant to the same article of law, the user also has the right to request the cancellation, transformation into an anonymous form or blocking of the data processed in violation of the law, and to oppose, in any case, for legitimate reasons, the processing of the data.

For the purposes of transparency towards users, it should be noted that this document may be subject to periodic revision in order to protect their individual right to proper data management.

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