



Subject: Policy information for customers and suppliers issued by the PANTA REI Social Cooperative
pursuant to Article 13 of Legislative Decree No 196/2003

This new policy drawn up pursuant to Article 13 of Legislative Decree No 196/2003 has been issued following the amendments introduced by Legislative Decree No 201 of 6 December 2011, which made significant changes to certain regulations.

This new policy therefore updates any previous versions issued up until now.

Now, therefore, it should be noted that:

- 1) as a result of establishing and carrying out a commercial relationship, our cooperative shall collect and process your personal data;
- 2) for the sake of clarity, we shall now specify the following definitions provided by Legislative Decree No 196/2003:

Processing: any operation, whether performed with or without the use of electronic means, regarding the collection, recording, organisation, storage, consultation, processing, amendment, selection, mining, comparison, use, interconnection, blocking, disclosing, circulation, deletion and destruction of data;

Personal data: any information on an identified or identifiable natural person, including indirectly, through reference to any other information, e.g. a personal identification number.

Therefore, pursuant to Article 13 of Legislative Decree No 196/2003 (Privacy Code),

we hereby inform you

that the undersigned cooperative shall collect and process your personal data in accordance with the following:

- a) **purpose:** your data shall be processed so that accounting, tax, commercial and technical obligations can be fulfilled, as well as any general company business relating to this relationship;
- b) **advertising purposes:** your data may also be used, subject to your specific explicit consent, for sending advertising material/communications by post, e-mail, fax, SMS or similar means; once you have granted your consent, you are nevertheless entitled to object, at any time and free of charge, to the processing of your data for this purpose;
- c) **methods:** your data shall be processed using either paper or electronic, IT or online support/tools, in full respect of the law and in accordance with the principles of lawfulness and fairness, while also ensuring your privacy is protected;
- d) **optional provision:** the provision of data is optional and non-compulsory;
- e) **consequences of refusal:** if you refuse to provide your data or wholly object to its processing, it might not be possible to conduct commercial or any other kind of relationships with our company; however, if you refuse to the use of your data for sending advertising material/communications, it will not have any consequences on present or future relationships between us;
- f) **subjects or categories of subjects to whom your data may be disclosed or circulated:** your data may only be disclosed to third parties to fulfil legal or contractual obligations. Your data shall not be circulated under any circumstances;
- g) **company data supervisors and processors:** your data shall only be processed by company data supervisors and processors from administrative and commercial sectors;
- h) **data subject rights:** data subjects are entitled to all the rights granted under Article 7, which is attached in full at the end of this policy and forms an integral part of it;



- i) **data processor:** the data processor is the PANTA REI Social Cooperative, with its head offices in Reggio Emilia, Largo M. Gerra No 1, in the person of its present legal representative;
- j) **data supervisor(s):** the data supervisor for the data subject is Dr Juri Torreggiani, with offices in Reggio Emilia, Via Piccard No 16/G, tel. +39 0522/38 28 11, fax +39 0522/38 79 96: any requests for clarification or information should be addressed to this data supervisor. The full, continuously updated list of the data supervisors is available on the company website and/or on any relevant paper documents stored at the company's head offices.

This policy may be integrated, orally or in writing, with additional components and recommendations to provide you with the best information on "Privacy" and to cover any regulatory amendments.

Reggio Emilia, 20/10/2015

The Data Processor
PANTA REI Social Cooperative

Article 7 of Legislative Decree No 196/2003 (Right to access personal data and other rights).

1. Data subjects have the right to obtain confirmation of the existence or otherwise of their personal data, even if not yet recorded, and that this data must be communicated in an intelligible form.
2. Data subjects have the right to obtain information on: a) the source of their processed personal data; b) the purposes and methods of the processing; c) how their data is processed in the event of electronic processing; d) the identity of the data controller, the data supervisors and the designated representative pursuant to Article 5, paragraph 2; e) the subjects or categories of subjects to whom the personal data may be disclosed or who may come across this data in their capacity as the designated representative of the State, the data supervisor or data processor.
3. Data subjects have the right to request: a) that their data is updated, amended or, where relevant, supplemented; b) that any data being processed illegally is deleted, anonymised or blocked, including any data which is being stored without good reason to the purposes for which it was collected and subsequently processed; c) confirmation that the parties to which the data has been disclosed or circulated have been notified of the operations specified under points a) and b), including their content, except in cases where this notification proves impossible or requires the use of methods clearly disproportionate to the right being protected.
4. Data subjects have the right to object, wholly or in part: a) on legitimate grounds, to the processing of their personal data, even if relevant to the purpose for which it was collected; b) to the processing of their personal data for sending advertising or direct sales material, or for carrying out market research and commercial communications.