

PRIVACY INSTRUCTIONS - Data Protection Policy

Pursuant to the terms and conditions of Section 13 of Legislative Decree n° 196/2003, the following instructions are hereby given:

a) Your personal data, which you voluntarily provided when filling in the registration form as a formal request for information about the Company's goods, services, promotions, and advertising initiatives, may be processed via electronic retrieval and telecommunications systems and saved to a database for the following purposes:

1. management, statistics, business, promotional, and advertising purposes, for the preparation of quotations or targeted marketing strategies, relative to services provided by

b) Processing methods: processing will be automatic and/or manual, and will entail the use of certain methods and instruments which have been designed to guarantee the uttermost security and privacy by a person or persons officially appointed to this task, pursuant to the terms and conditions of Sections 31 *et seq.* of Legislative Decree n° 196/2003.

c) Range of communications and circulation: your personal data may be communicated for the purposes listed above at Sub-section a) to these instructions to other companies in the *SYPEL SRL* Group and other persons appointed by our Company in the business and/or administrative departments;

up to the limits enshrined in current enacted law, to comply with contractual obligations or other purposes relative to third parties belonging to the following categories:

- service providers for the electronic retrieval system at *SYPEL SRL* and telecommunications networks (including by e-mail);
- service companies for the acquisition, storage, and processing of data from documents or other formats produced and provided by customers themselves, for the purposes of large-scale works relative to payments, effects, cheques, and other securities;
- providers of customer assistance (*e.g.* call centres, help desks, *etc.*);
- studios or companies providing assistance or advisory services;
- persons providing control, review, and certification services for activities brought about by *SYPEL SRL*, including those set up in our customers' interests;

The person or persons belonging to the aforementioned categories are either to carry out the function of external data processing managers, or to work completely independently as data processing officers in their own right.

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 BRAMBATI PAOLA 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 at S.S. PER MILANO 13 – 20069 VAPRIO D'ADDA (MI), or e-mailing INFO@SYPEL.IT Any other communications will only be made with your explicit, prior consent.

d) Nature of transfer: The transfer of your data is purely optional. However, *SYPEL SRL* may not be able to provide you with the services necessary for us to meet our contractual, accounting, and fiscal commitments.

The data processing officer furthermore wishes to state that any failure to make notification of the notification of false data (where notification is required) shall have the following effects:

- . the impossibility on the officer's part to guarantee consistency in processing under the terms and conditions of the contract for which it is performed;
- . a possible lack of correspondence between the results of processing and the requirements of current enacted fiscal or administrative law, or of the employment for which purposes it would otherwise be required.

You are entitled to exercise your statutory rights as specified in Sections 7, 8, 9, and 10 of Legislative Decree n° 196, dated 30 June 2003 by contacting the data processing officer (or manager if one has been appointed).

e) It must be remembered that, pursuant to the terms and conditions of Section 7 (Rights of access to personal data and other rights),

1. the Party shall be entitled to confirmation that his personal data exist or do not exist, even if they have not been saved yet, and to read them.

2. The Party shall be entitled to information about –

a) the origin of personal data; b) the purposes and methods of processing; c) the reason or reasons for which they have been saved using electronic retrieval devices; d) the particulars of the data protection officer and manager, and the representative appointed pursuant to Section 5 (2); e) the person or persons or category or category of persons to whom data may be communicated all who may come to see the data as the representative, manager, or appointee.

3. The Party shall be entitled to require – a) the updating, correction, or – when applicable – the integration of his data; b) the cancellation, conversion into an anonymous form, or stoppage of unlawfully processed data, including any data which does not need to be saved for the purposes for which such data were originally gathered or subsequently processed; c) an attestation that the operations or the content of the operations specified above at Subsections a) and b) have been brought to the attention of those to whom the data have been communicated, except where in any compliance with this requirement is impossible or requires the application of resources which are incommensurate with the Party's statutory rights.

4. The Party shall be entitled to object –

a) to the processing of his personal data, even if relevant to the purposes for which they have been gathered for lawful reasons;

b) to the processing of his personal data for the purposes of direct sales or sending advertising material, or for carrying out market research or business communications.

In terms of the aforementioned processing, the person to whom any such data refer shall be entitled at any time to seek confirmation of whether or not the data actually exist, to know their contents and origin, check the exactitude thereof, or ask for them to be integrated, updated, or corrected, pursuant to the terms and conditions of Section 7 of Legislative Decree n° 196/2003. Pursuant to this Section, the Party shall be entitled to ask for these data to be cancelled, converted into an anonymous form, or stopped, even if they are relevant to the purposes for which they have been gathered or for the purpose of sending advertising material, or for carrying out market research or business communications.

f) The data processing officer shall be *SYPEL SRL*, having their registered offices at VAPRIO D'ADDA (MI), S.S. PER MILANO 13 ;

g) The personal data you have provided will be stored at *SYPEL SRL* Company offices at VAPRIO VAPRIO D'ADDA (MI), S.S. PER MILANO 13;

h) 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;

i) The personal data you have provided may be transferred overseas, to another country within the European Union, pursuant to the terms, conditions, and limits specified at Section 42 of Legislative Decree n° 196/2003. Personal data may be transferred overseas to countries outside the European Union, pursuant to the terms, conditions, and limits specified at Section 44 (d) of Legislative Decree n° 196/2003. In this regard, specification is hereby made that our Company works exclusively with companies who have subscribed to the "Safe Harbour Principles in Privacy Matters."

For any further information and/or explanations, please contact:

SYPEL SRL

S.S. PER MILANO 13 – 20069 VAPRIO D'ADDA (MI)

Tel.: 02.90966232;

Fax: 02.90966232;

e-mail: INFO@SYPEL.IT