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PRIVACY POLICY WWW.ICONA.IT

UPDATED AS OF DECEMBER 2017

NOTE ON PERSONAL DATA PROCESSING

pursuant to Article 13 of Italian Legislative Decree 196/03

This Note - drafted pursuant to Article 13 of Italian Legislative Decree no. 196 of 30 June 2003 ("Data Protection Act") describes the purposes and procedures of the processing of the personal data of the Users and Customers who browse the website www.icona.it (hereinafter for the sake of brevity the "Website") and/or which in any case interact on it (hereinafter for the sake of brevity the "Users" or "Data Subjects"). The Users or Data Subjects are the natural persons to whom the personal data processed by the Data Controller refer. The Customers are the third party Companies, Partners of ICONA to which the personal data processed by the Data Controller refer. The Data Controller is the company ICONA SRL, represented by its pro tempore legal representative, with registered office in Monza (20900 - MB), in Via Augusto Murri, 12, Tax Code 01110530191, VAT number 02812760961 (hereinafter also referred to for the sake of brevity as "ICONA" or the "Data Controller" or the "Company"). The information present in the Website is provided free of charge by the Data Controller and in good faith; under no circumstances can the Data Controller be held responsible for any direct or indirect damage caused by the use of the Website. This Note could be subject to updates without prior warning: by continuing to browse the Website, the User and the Customer fully and automatically accept the relative variations. Browsing on the Website is free, free of charge, reserved for adults and does not require the User to register on the same. The User and Customer are not required to confer their data, except to ensure the fulfilment of the purposes indicated below; in any case, both the User and the Customer can revoke their consent at any time by sending a simple written request to the Data Controller. Failure on the part of the User and Customer to explicitly authorise the processing of their data could prevent the Data Controller from sending the User and Customer communications for commercial and promotional purposes and/or communicating the User's data to third parties for the same purposes. This Note is only provided for the Website and not also for other websites that may be consulted by the User and the Customer via redirecting links: in the latter case, the Note on

Personal Data Processing will be provided by the Data Controller of the third party website.

DEFINITIONS

The “Users” are the natural persons to whom the personal data processed by the Data Controller refer (hereinafter also referred to for the sake of brevity as the “Users” or “Data Subjects”); who browse on the Website and/or, in any case, interact on it. The “Customer/Licensee” is a third party company, Partner of ICONA, whose personal data are processed by the Data Controller (hereinafter also referred to as the “Customer”) and which has signed a user licence contract with ICONA for the ICONA products promoted and advertised on the Website.

NATURE OF THE PROCESSED DATA

The Data Controller collects and processes the following categories of personal data of the Users who browse the Website:

- a) Data conferred spontaneously by the User, who interacts with the Website voluntarily by sending the Data Controller a “Request for information” via the CONTACT US section of the Website, where the User enters their “First name and surname”, “email address”; “Company”; “Telephone number” and any other data indicated spontaneously by the User in the text of the “Message”.
- b) Data generated when the User browses the Website: the so-called “Browsing data” are automatically acquired when the User browses the Website and are necessary to ensure that the Website functions properly. These data are not collected with the purpose of identifying the User but only to source anonymous statistical information in aggregated form about the use of the Website, and to verify that it works properly. The browsing data could be communicated by the Data Controller to the responsible Authorities in case of cybercrimes that cause damage to the Website, and could be used by the Authorities to verify the responsibilities and identify those responsible for the same.
- c) We do not process sensitive or legal data pursuant to Article 4, paragraph 1 of Italian Legislative Decree 196/2003 Should a requirement to process this kind of data arise, we will seek the prior written consent of the Data Subject.

PURPOSES OF THE PROCESSING

The personal data communicated by the Users and Customers via the Website will be processed by the Data Controller for the following purposes:

- 1) “First name and Surname”; “e-mail address”, “Company”; “Telephone number” are all data spontaneously conferred by the User when entering the CONTACT US section. These data will be used by the Data Controller to interact with the User and respond to their requests for information or support, and also, subject to the User’s explicit authorisation, for promotional purposes, enabling the Data Controller to send promotional and advertising communications.
- 2) The Data conferred by the Customer/Licensee will be used by the Data Controller to fulfil the user licence contract which has been signed and to send communications regarding the ICONA products; these include, by way of example only, commercial, administrative and marketing communications;

- 3) To enable the Data Controller to carry out operations which are closely connected and instrumental to the correct management of the relations with the Users and Customers, also with regard to the functioning and correct use of the Website;
- 4) To perform statistical analyses in an anonymous and aggregated form;
- 5) Subject to the explicit consent of the User and the Customer, to contact the same by telephone or e-mail, for the purposes of marketing, direct sales and the sending of promotional and commercial communications relative to the ICONA products;
- 6) Subject to the explicit consent of the User and the Customer, the personal data of the same can be communicated to third parties for the purposes of marketing, direct sales and the sending of promotional and commercial communications;
- 7) To fulfil the obligations of the laws or regulations in force;
- 8) To manage any complaints and enable the Data Controller to protect its rights.
- 9) The User and Customer are never under obligation to confer their data, except when these are required for the fulfilment of the purposes indicated above.

Failure to confer the data could prevent the Data Controller from sending the User and the Customer communications with commercial and promotional purposes and/or from communicating data to third parties for the same purposes, as defined above in points 5) and Even if the User and Customer have authorised the processing of their data for said purposes, this consent can be revoked at any time, by sending a simple request addressed to the Data Controller.

PROCESSING PROCEDURES

The data will be processed lawfully, according to the principles of correctness and in compliance with those of necessity, relevance, completeness and minimisation, in relation to the purposes for which they are processed. The Data Controller will process the data of the User and the Customer with electronic means suitable for guaranteeing, in relation to the purposes for which the data have been collected, the safety and confidentiality of the same, and to prevent unauthorised access to the data, for a period of time not exceeding that necessary for the purposes indicated above. The data will be processed in the Data Controller's local unit, located in Cinisello Balsamo (MI), in Viale Brianza, 20, only using staff specifically appointed to carry out the processing. In order to pursue the purposes indicated above, the Data Controller may also need to communicate the personal data of the User and the Customer, in Italy and abroad (including countries not within the European Union) to third parties belonging, by way of example only, to the following categories: parent and subsidiary companies; parties that perform technical and IT duties on behalf of ICONA SRL; parties that provide services for the management of the information system of ICONA SRL; parties that perform customer support activities (e.g. call centres, etc.); parties that perform filing and data entry activities; professional studios and companies in the field of consultancy and support relationships; parties that perform market research upon appointment from ICONA SRL. The parties belonging to the categories reported above will process the data of the Users and Customers as Autonomous Data Controllers, or as Data Supervisors, appointed specifically for this purpose by the Data Controller. The list of the third parties to which the Data Controller will communicate the personal data of the Users and Customers is available for consultation by the User at the registered office of the Data Controller. The Data Controller will undertake to ensure that the

personal data that come to their knowledge will not be disseminated.

RIGHTS OF THE DATA SUBJECT

Each User/Customer can exercise their rights pursuant to Article 7 of Italian Legislative Decree 196/2003 by sending a simple written request to the Data Controller. These rights include, but are not limited to:

- i. The right of access to one's own personal data, to obtain confirmation of their existence care of the Data Controller, to know their origin and the purposes and procedures of the relative processing;
- ii. The right to know the data which identifies the Data Controller and any Data Supervisors appointed;
- iii. The right to know the parties or categories of parties to which the personal data have been communicated;
- iv. The right to have any data processed in breach of the law cancelled, anonymised or blocked, and the right to have data updated, corrected or, if of interest, integrated if incorrect or incomplete.
- v. The right to object to the processing of one's data for legitimate reasons;
- vi. The right to object to the processing for purposes of commercial information or for the sending of advertising material or for direct sale or market research.

The requests must be sent in writing to the company ICONA SRL, at the local unit located in Viale Brianza, 20 20092 Cinisello Balsamo (MI) Italy, or to the e-mail address sales@icona.it

COOKIE

Cookies are small text files that the websites visited by the User send to their browser, where they are temporarily memorised. Regarding the types of cookies used by the company ICONA Srl in the Website www.icona.it, and in order to acquire any additional information about these, full reference should be made to the Cookie Policy http://www.icona.it/it/docs/Cookie_sito_EN.pdf

