

**DATA PROTECTION POLICY
REPORT ON PERSONAL DATA PROCESSING, ACCORDING TO ARTICLE 13, ITALIAN LEGISLATIVE
DECREE, JUNE 30 2003, NO.196**

In compliance with the provisions of Italian Legislative Decree June 30, 2003, no.196 (Privacy Consolidation Act), in the application of European Directive no.95/46 EC, we hereby supply you all due information concerning the purposes and methods for the processing of the personal data you have provided, as well as the limits of communication and circulation of this data, the nature of the data in our possession and its underwriting. The privacy report of **CANALI S.p.A.** regulates the processing of the personal data of the party in question, including, but not limited to, the collection, use, retention and protection of the information provided and/or collected for the purposes stated below.

Purposes of data processing

a) the data you provide will be processed for:

- activities closely connected and critical to the management of relationships;
- the provision of goods and services you have requested and for the protection of credit positions deriving from these goods and services;
- the provision of the relevant services as set forth in the contractual conditions and therefore to allow all the activities related to the execution of the contractual agreement to be carried out and the related services and obligations to be fulfilled;
- possible registration of the owner of the data on internet websites and platforms using data collection forms;

b) the data you provide will be processed for:

- commercial, marketing, promotional, statistical or market research purposes.

Your data may be communicated exclusively for these purposes by **CANALI S.p.A.** to associated companies and/or subsidiaries of **CANALI S.p.A.** as well as companies controlled by the group, companies linked contractually to **CANALI S.p.A.** or forming part of its distribution network, possibly also with offices in countries that do not belong to the European Union, and in this case the latter will process data exclusively for:

- promotional announcements, including customized announcements, for informative activities on paper, via email and possible text messages, newsletters and circulars;
- market research or other research on samples, commercial activity, economic/statistical analysis;
- organization of meetings, parades and similar;

Personal data will not be used for the purposes stated in point b) without your consent. The person in question can opt for this service at the time the personal information is provided.

Methods of data processing – Data Retention

The data processing will be carried out automatically and / or manually, by authorized personnel, with means and methods that will guarantee maximum security and confidentiality in compliance with the provisions of articles 31 ff of Italian Legislative Decree 196/03. The data will be kept at **CANALI S.p.A.** or at the offices of the parent company or of third parties identified from time to time to carry out the services to be provided for the period of time that is strictly necessary for the purposes stated above and in any case not exceeding the period of time prescribed by law. In compliance with the laws in force, specific security measures have been observed in order to prevent the loss of data, as well as illegal, incorrect or unauthorized uses. The personal data collected for administrative contractual purposes (the requested services) will be kept for a period that does not exceed the administrative purposes for which the data has been collected and subsequently processed, except for the real transformation of the data into an anonymous form.

Limits of communication and circulation

Your processed data will not be circulated, but may instead be communicated by **CANALI S.p.A.** for the purposes stated above to associated companies and/or subsidiaries of **CANALI S.p.A.** as well as companies controlled by the group, companies linked contractually to **CANALI S.p.A.** or forming part of its distribution network, possibly also with offices in countries that do not belong to the European Union, and in this case will be processed only for the aforesaid purposes. Data may be communicated abroad within the European Union, in compliance with and within the limits of article 42 of Italian Legislative Decree no.196/2003. The personal data may be communicated to third parties belonging to the following categories:

- persons or companies holding the position of Manager, Agent or Owner also abroad. These subjects may be within the company, such as staff or co-workers, or be other associated companies, licensees or other bodies and companies outside the sector, consultants, lawyers, public bodies, for the sole purposes described above.

The subjects belonging to the above categories are to be considered Managers of the data processing, or as acting independently as distinct Owners of the data processing. The list related to these subjects, constantly updated, is available at **CANALI S.P.A.**. Any further communication and circulation will be subject to your previous approval.



Nature of underwriting and consequences of its refusal

The underwriting of the data for the purposes stated in point **a)** is obligatory and necessary in order to conclude and carry out all relations with **CANALI S.p.A.**

The owner also points out that, any missing or incorrect communication of the obligatory information may cause the following consequences:

- The impossibility for the owner to guarantee the respect of the contractual agreements related to the data processing;
- The possible incompatibility of the data processing results with the fiscal and administrative regulations or with the operations for which the data is required;

The underwriting of data for the purposes stated in point **b)** is optional, thus it does not derive from a legal obligation: if the data is not underwritten for these purposes, the only consequence is that you cannot be contacted by **CANALI S.p.A.** and by associated companies and/or subsidiaries, as well as companies controlled by the group for commercial, marketing, promotional, statistical or market research purposes.

If you refuse to give your consent to the purposes stated in point **b)** above, this does **not** imply any negative consequence regarding your requests and the execution of the related service.

You may enforce your rights as stated in articles 7, 8, 9 and 10 of Italian Legislative Decree June 30, 2003, no.196, by contacting the owner or the person responsible for the processing.

Art. 7. Right to Access Personal Data and Other Rights

1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him/her exist, regardless of whether the data has already been recorded, and communication of such data in intelligible form.
2. A data subject shall have the right to be informed: a) of the source of the personal data; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if the latter is carried out with the help of electronic means; d) of the identification data concerning data controller, data processors and the representative designated as per Section 5(2); e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.
3. A data subject shall have the right to obtain: a) the update, rectification or, where interested therein, integration of the data; b) the cancellation, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
4. A data subject shall have the right to object, in whole or in part: a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection; b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or for performing market or commercial communication surveys.

For any request for information and/or explanations, questions or complaints on the processing of personal data, we kindly ask you to contact the person responsible for data processing indicated below in writing. If you no longer wish to be contacted, the use of your personal data will cease immediately. If you contact the company, you are kindly requested to provide your email address, name, address and/or telephone numbers so that your request can be managed correctly. In order to remove your details from the mailing list you can send an email to the address privacy@canali.it or a letter to **CANALI S.p.A.**, to the address stated above, at any time with the subject line "removal from mailing list". The updated list of the managers will be communicated on simple request. 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.

The Data Controller is: **CANALI S.P.A** - Via Lombardia, 17/19 - 20845 Sovico (MB), in the person of its legal representative.

The Data Processor is the Marketing Manager
Sovico – June 11, 2012

The Data Collector

CANALI S.P.A