



Privacy policy statement and request for consent to personal data processing by Molteni Vernici s.r.l.

Statement pursuant to and for the purposes of article 13, Italian legislative Decree of 30 June 2003 No. 196

In compliance with the Italian Legislative Decree of 30 June 2003 No. 196 (Privacy Consolidating Act), Molteni Vernici srl here in provides the following information regarding Personal Data Processing and Treatment.

1. Aims and means of personal data processing.

1.1 *Aims of processing and treatment.* Personal data and information are acquired through the consent of the interested party (Article 23, Legislative Decree 196/03) in the event of:

- a) Request of registration on the internet site of Molteni Vernici srl., and possible sending of information and catalogues you have requested, in order to allow Molteni Vernici srl to treat and process data regarding the registration and in order to meet the requests of the interested party;
- b) Newsletter subscription, in order to send the aforesaid newsletter;
- c) Carrying out of activities strictly connected and instrumental for management of business relationships, for example:
 - Gathering of preliminary information for closing contracts;
 - Activities concerning the supply of goods and services with the aims of fulfilling obligations from finalized contracts as foreseen by single contractual conditions;
 - Accounting activities (issuing of invoices, payments, etc.);
 - Safeguarding of credit positions of Molteni Vernici srl derived from the contract;
- d) Carrying out of promotional activities by Molteni Vernici srl, such as:
 - Market research and surveys;
 - Communication of promotional and informative material through advertising brochures and paper promotional material, emails, text messages, and MMS;
 - Possible prize programmes and contests;
 - Surveys on customer satisfaction;
 - Possible organization of meetings, conventions and similar events.

1.2 *Processing and treatment methods.* Molteni Vernici srl handles personal data and information with a great deal of attention.

Data processing will be carried out in an automatic and/or manual electronic format, with methods and instruments used in order to ensure the highest level of security and confidentiality, managed by experts hired for this reason, in compliance with article 31, and following articles or amendments of Italian legislative decree 196/03.

Data will be stored at Molteni Vernici srl headquarters in Cantù, and in any case with those procedures foreseen by Article 3 of the present document (Communication and disclosure of personal data and information). Personal data that is collected or used for statistical surveys shall be treated in an anonymous manner.

Personal data and information shall be held only for the time required for carrying out the aforesaid aims and in any case not for a period exceeding that foreseen by current laws.

In compliance with current laws and regulations, specific security measures shall be taken in order to avoid loss of data, illicit or incorrect use, and unauthorized access of databases.

2. Obligatory nature of providing personal data and consequences in case of non-provision of data.

2.1 Providing the personal data and information required in order to carry out the activities stated in points a), b) and c) of paragraph 1.1 is obligatory and is a condition necessary for the carrying out of instrumental and related activities to the stated aims. Refusal to provide data or information indicated with an asterisk (*) as "obligatory" in the request form will make it impossible for Molteni Vernici srl to carry out the requested actions. In particular, lack of communication or erroneous communication of one or more parts of obligatory data will make it impossible for Molteni Vernici srl to:

- (i) Proceed with visitor's registration on the website;
- (ii) Send any information and/or catalogues to the requesting party/visitor;
- (iii) Send the newsletter;
- (iv) Conclude any contract and therefore any service or activity.

2.2 Communication and providing of personal data and information, on the other hand, is voluntary and the consent for the treatment and processing may be given or not by the interested party regarding what stated in point d) of paragraph 1.1. Withholding of personal data in this event will impede Molteni Vernici srl to use personal data for the aims indicated in point d) of paragraph 1.1 and will make it impossible to be contacted by Molteni Vernici srl for the aims stated in point d) yet it will not have any negative consequence regarding the requests and aims stated in points a), b) and c).

3. Communication and disclosure of personal data.

Data of personal nature that is the subject of data processing by Molteni Vernici srl will not be disclosed to the public. However, this information may be communicated by Molteni Vernici srl for the aforesaid aims, to associated and/or subsidiary companies of Molteni Vernici srl or companies that are part of its distribution network (such as branches, importers, distributors...), possibly with headquarters in countries outside the European Union, and in these cases the data will be processed exclusively for the aforesaid aims within the area and limitations of current laws and regulations.

Data may be communicated abroad, both within the European Union in compliance with article 42 of the Italian legislative Decree No. 196/2003 and to non-EU countries within the area and limitations of current laws and regulations. Data can be communicated to third parties from the following categories:

- Subjects that provide services for the management of IT systems used by Molteni Vernici srl and the telecommunications network (including email);
- Subjects, also outside the companies, for electronic and/or paper document archiving and storage;
- Service companies for collection, registration and processing of data from documents, or supports provided by customers and pertaining the processing of payments, bills, checks, or other titles;
- Subjects that carry out customer care, as well as through websites (e.g. call centres, help desks, etc.);
- Firms or companies in the field of consulting and support for Molteni Vernici srl, including those actions for company and organizational management control;
- Boards and public administration for the check and assessment in compliance with fiscal and civil obligations;



- Banks and credit/insurance institutions for the carrying out of insurance and financial activities (payments/collections/financing);
- Subjects that carry out checks, audits and certification of activities by Molteni Vernici srl, including in the interests of the customers.
Subjects from the aforesaid categories work in total autonomy as Data Controller. The list of Data Controllers is constantly updated and available at the headquarters of Molteni Vernici srl

Any other further communication or disclosure of the data will take place only upon express consent of the interested party. The storage and sending of personal data through the Internet is protected by the latest technology used in this field.

4. Right of the interested party.

4.1 The interested party may make use of the rights as stated in articles 7, 8, 9 and 10 of the Italian legislative Decree 30 June 2003 No. 196, by contacting the Data Controller or the Data Processor.

4.2 Pursuant to Article 7 of the Italian Legislative Decree 30 June 2003, No. 196, the interested party has the right to obtain confirmation of the existence, or lack thereof, of personal data, even if they are not registered, as well as information on the communication of data in an intelligible manner.

The interested party has the right to obtain information on: a) the origin of the personal data and info; b) aims and methods of treatment/processing; c) the logic applied if electronic instruments are used; d) general information on the data controller, data processors or any representatives designated; e) subjects or categories of subjects to whom the personal data can be sent or that may get to know the data, as designated representative, data processors or persons in charge of it.

The interested party has the right to obtain: a) updating, modification, or if interested, adding of information; b) cancellation, changing in an anonymous manner, or blocking of data treated in an illegal manner, including data collection for aims that are not required or outlined hereinabove; c) statements regarding operations as described in letters a) and b), and their confirmation, as well as their content and those subjects who have received this data or information, with the exception of those situations where this action is impossible or requires the use of means that are not proportionate to the safeguarding of this right.

The interested party has the right to oppose, completely or partially: a) for legitimate reasons to data treatment and processing, as long as they are pertinent to the aims and goals of data collection; b) personal data treatment or use for the sending of advertising material or direct sales materials or the completion of market research or sales communication.

5. Specific information on "Cookies".

Cookies are files or parts of information that are archived on a hard disk of the user's computer (files sent by the website server to the user's browser) when sites are visited. Session cookies that are used are aimed at speeding up the analysis of traffic on the Internet and facilitate user access to the services offered by the website. The majority of browsers are set up to accept cookies. If you do not want to accept cookies, you can set up your computer so that they are refused, or receive a warning when cookies are archived.

If the user refuses the use of cookies, the possibility to supply personalized services is limited. In this last case, some of the functions of the site may not work properly and some services may not be available. Cookies cannot be used and will not be used to capture email addresses of the users, nor will they be used in order to obtain information from hard disk or confidential or sensitive personal information.

In order to allow for the activation of specific functions of the services, and in the time required for the performances of these services, the Molteni Vernici srl website will use c.d. cookies. Data regarding cookies will not be disclosed.

6. Opinion surveys.

In the event that the user participates in survey, he/she will be invited to indicate if he/she can be contacted for a follow-up with the aim of research/study, for example, regarding the user's opinion on new products, features, etc. In the event that there is a positive answer to this question, included in the majority of the questionnaires, the user may be contacted later via email or telephone, until he/she decides to discontinue this activity.

7. Persons responsible for treatment and processing.

Personal data and information shall be filed and stored at the offices of Molteni Vernici srl, located in via dell'artigianato 44, Cantù (22063 - COMO), with the exception of that stated in article 3.

Data controller of the processing is Molteni Vernici srl, represented by its pro tempore legal representative.

Data Processor is Mr. Giacomo Molteni, at Molteni Vernici srl, Via dell'Artigianato, 44 - 22063 - Cantù (CO).

For any requests for information and/or clarifications, questions or claims on the treatment of the personal data of the interested party, please send this request in writing to the Data Processor, by email to info@moltenivernici.com or slug mail to Molteni Vernici srl, Via dell'Artigianato, 44 - 22063 - Cantù (CO). When contacting Molteni Vernici srl, in order to allow for the proper management of your request, the interested party will need to provide their email address, name, home address and/or telephone number.

8. Removal from the mailing list and subject list as described in Article 3.

Should the interested party no longer want to be contacted, the use of personal data by Molteni Vernici srl will immediately stop once this communication has been received, however with the exception of the information required to complete any unfinished business relations.

In order to be cancelled from the mailing list, you must simply write, at any time you wish, to the email address info@moltenivernici.com or by mail to Molteni Vernici srl, Via dell'Artigianato, 44 - 22063 - Cantù (CO), with the subject: "cancel from mailing list".

In order to receive an updated list of those subjects as described in Article 3, please send an email to info@moltenivernici.com or by standard mail Molteni Vernici srl, Via dell'Artigianato, 44 - 22063 - Cantù (CO) with the subject: "Communication of subject list for personal data treatment".

9. Modification to the privacy policy statement by Molteni Vernici srl.

Molteni Vernici srl reserves the right to change, modify, add or remove parts of this privacy policy, upon the company's discretion and at any time. The user must periodically check the possible modifications to the pages herein. In order to make this check easier, the policy shall contain the date it was published on the website. Continued use of the website after publication of the aforesaid changes to this privacy policy implies acceptance of these changes.

Molteni Vernici Srl