

Declaration regarding the handling of personal data for the purposes of commercial information

The present declaration, in line with current privacy legislation (D.lgs. n. 196/2003 – Data Protection Act and UE regulation number 2016/679, hereafter “Regulation”), is hereby provided by Azeta S.rl. for the purposes of investigative activities (Deontological Code. This declaration is in line with the Italian Data Protection Authority via Deliberation n.479 dated 17/09/2015, and published on the Official Journal n.238 on 13/10/2015.

1. SOURCE OF DATA HANDLED

Dear Sir/Madam

We hereby inform you that, on the basis of prefectural authorisation (in accordance with art. 134 of the norms in force regarding Public Safety), our Company collects and handles data provided directly by interested parties as well as data sourced from public registers, lists and archives. We also collect and handle data contained in publically available acts or documents (e.g. documents from the Chamber of Commerce or Italian Inland Revenue), and data accessible from sources available to the public such as newspapers, lists and websites.

2. TYPE OF DATA HANDLED

Our company can acquire information on the activities of economic operators (e.g. freelancers, family businesses, professionals, entrepreneurs, company representatives) regarding organisational, productive, industrial, commercial, economic, financial, patrimonial, administrative and accounting aspects. The company can also acquire information on individuals who do not have a professional or entrepreneurial role. Commercial information includes data, for example, related to company registration reports, company balances, overdue bills, bankruptcy procedures, extraordinary real estate charges and burdens, cadastral records and publically recorded judicial data accessible to the public.

Where requested by our clients, personal data may be integrated and enriched with further information, for example, regarding the payment history of a business or professional in commercial relations with clients, suppliers and partners, via research by post, fax or telephone contact with private sources (other companies or economic operators). From this perspective, as per the declaration provided by the latter to interested parties it is possible for information to be communicated to companies such as our own for the purposes of checking the reliability or solvency of an economic operator. The data in question is accounting data elaborated in aggregate form by our systems. We do not collect or handle sensitive data or data that constitutes a business or industry secret.

Where strictly required by the Deontological Code, our company may handle data regarding criminal convictions and offences (art. 10 of the Regulation) from public sources or, in certain circumstances, from generally accessible sources such as those identified in paragraph 1 of the present declaration.

3. PURPOSE OF DATA COLLECTION AND HANDLING

Data is handled by our company, as data controller, in order to provide third parties (our clients) with commercial information services used to evaluate the activities, solidity and capabilities of a person from an economic and commercial point of view and to carry out checks for the purposes of commercial and personal relationships (which may be excluded in case of missing or incomplete information) and safeguarding of associated rights.

Commercial information can also be requested by our clients, in the form of lists (by sector or category), for marketing activities, telephone contacts and direct mail for commercial, promotional and advertising purposes. All activities are carried out in full respect of the legal obligations and prohibitions outlined in the norms in force regarding the use of automatized systems such as e-mail, fax, voice recorded messages and SMS in the absence of prior consent on the part of the interested parties).

Personal data acquired by our company can be the object of ulterior analysis or statistical elaboration using automatised methods and/or the intervention of experts in order to attribute an evaluation or opinion on the reliability, solvency and capability of the person or business concerned from a commercial or economic point of view. This information can also be used to evaluate the probability of insolvency of a company by looking at, for example, the patrimonial, economic and financial situation alongside previous and current credits and debits. Information of this type might also regard individuals with relevant roles or responsibilities.

4. LEGAL BASIS FOR DATA HANDLING

The handling of data for the purposes of obtaining commercial information as described above, with the aim of formulating, within the terms already described, an evaluation of the solidity, solvency and reliability of the subject, is based on the need to act in the legitimate interest of our company and its clients. Our company acts to provide commercial information to clients who request them to carry out necessary checks on the economic, financial and patrimonial situation of interested parties, as a security measure prior to the establishment or during the management of commercial and personal relationships (also pre-contractual), for the supply of goods and services and the definition of payment terms. The information is also used to ensure the respect of the associated norms in force, regarding, for example, anti-money laundering and fraud prevention and to safeguard rights.

Let it be understood that data handling will be carried out in full observance of the Code of Conduct, with the applicable norms and the interests and fundamental rights and freedoms in accordance with art. 6, comma 1, let. f of the Regulation.

5. METHODS AND SECURITY OF HANDLING

Data is gathered prevalently via IT tools, and, following checks to guarantee congruity, completeness and accuracy it is registered in our company databases and updated periodically.

Said databases are organised and managed with computerised systems which permit communication to our clients of documentation containing data extracted from publically available sources and/or analysis, comparisons or elaboration of reports or informative dossiers of an economic or commercial nature.

All of the personal data gathered and handled by our Company are held and protected with adequate security measures, both computerised and otherwise. Within our company, data is known only by those involved in or responsible for the gathering, analysis, elaboration, and communication of said

data, for the writing of commercial reports, or for technical assistance and maintenance of our computer systems.

6. COMMUNICATION OF DATA

Personal data can be communicated, telematically or otherwise, exclusively to clients who request it in Italy or overseas and who in turn become independent data controllers.

Data will not be distributed or communicated in any other way.

7. DATA CONSERVATION

Information from public sources and related to negative events as mentioned in the present Declaration and as detailed in the Deontological code are conserved by our company for the purposes of providing investigative services within the following time scales:

- a) Information related to bankruptcy for no more than 10 years following the opening of the bankruptcy procedure. After this period of time has elapsed, said information may continue to be used by our company solely where there is other information present relating to another bankruptcy procedure related to the same subject or a connected subject. In this case the period for which data can be conserved can be extended for a maximum of 10 years from the opening of that procedure.
- b) Information related to real estate (mortgages and property seizure) for no longer than 10 years from their registration, except in case of cancellation prior to this period elapsing. In the latter case, data will be conserved for a period of two years following cancellation.

With the exception of the above cases, personal data from the previously identified sources can be conserved by our company for the purposes of providing clients with commercial information for the length of time foreseen by the norms in force.

8. RIGHTS OF PARTIES CONCERNED

We hereby inform you that under the applicable norms interested parties reserve the right to: **(i)** ascertain whether or not our company is handling any data concerning them, **(ii)** rectify and/or update inaccurate or incomplete data, **(iii)** delete data in cases outlined by art. 17 of the Regulation, **(iv)** to limit data handling in the presence of conditions outlined in art. 118 of the Regulation, **(v)** to request notification of rectification, deletion or limitation on the part of the company to subjects to whom data has been communicated, **(vi)** to present a complaint to the Italian Data Protection Authority.

Interested parties have the right to oppose the handling of their commercial data by our company if they can demonstrate, in accordance with art. 21, comma 1, of the Regulation, that their interests, rights and freedoms have precedence over the legitimate interests of the Data controller as outlined in paragraph 4.

The right of portability of data (outlined in art. 20 of the regulation) does not apply except where the data handled by our company has been collected directly from the interested party and has as its purpose the execution of a contract between the company and the same interested party.

The interested party can exercise their rights under the condition that the object of the request is not the rectification or integration of personal data used to by our company for evaluation, judgements

opinions and other subjective interpretations, or indications of conduct to consider or decisions being deliberated by our company.

Using the portal www.informativaprivacyancic.org and the section designed for this purpose ([link](#)) interested parties can send a request to our company to confirm the presence or otherwise of personal data in our databases. If they wish, they can then follow the instructions to exercise the abovementioned rights.

9. CONTACTS

For further information on data handling carried out by our company and for any specific requests regarding personal data, please consult the information on our website www.azholding.it.