



Privacy Policy

The Privacy of this website

WEBARTEX shall manage all the personal data of its customers by properly checking that the law provisions pursuant to what envisaged by the Italian national legislation on privacy are complied with – particularly the Legislative Decree 196/03, which transposes the Directive 95/46/EC on the protection of personal data, as well as the Directive 2002/58/EC on the protection of personal data in electronic communications. This shall apply only to the WEBARTEX website and not to the other websites possibly consulted by users through links. For further information on the Italian law on privacy, we invite you to visit the official website of the Regulatory Authority for the protection of personal data at the address www.garanteprivacy.it.

Entity responsible for treatment and place of treatment

The entity responsible for the treatment of personal data shall be WEBARTEX SRL, owner of the WEBARTEX mark, with registered office in Via Leonida Bissolati 54, 00187 Rome, which shall autonomously decide the aims and ways of data treatment, including the security profile. The personal data and information – hence the treatment connected with the services of this website – shall be collected and kept in databases and shall be processed by the technical staff of the Office in charge of said treatment, appointed by WEBARTEX, which shall manage them according to the instructions provided by the owner; by employees or aides of the entity in charge of treatment or by entities possibly entrusted with the task of occasional maintenance operations.

Type of data treated

Navigation data

During their ordinary activities, the information systems and the software procedures for the operation of this website acquire some personal data whose transmission is implicit in the use of the Internet communication protocols. These information and data are not collected to be associated with identified interests, but – due to their very nature – they could allow to identify users, by means of processing and associations with data held by third parties. This class of data include the IP addresses or the domain names of computers employed by the users who connect themselves with the website; the URI



(Uniform Resource Identifier) addresses of the resources requested; the hour of request; the method used to submit the request to the server; the size of the file received as reply; the numerical code showing the state of the reply provided by the server (success, mistake, etc.) and other parameters relating to the operating system and the user information environment.

Registration data

The access and enjoyment of particular services shall be made conditional upon registration and the preliminary communication of personal data. It is the prerequisite for reaching and managing the contract for the provision of services and the related operations of interest to the customer. During the registration phase WEBARTEX will ask users to create a user ID (or pseudonym) and enter twice a password of at least six characters, which are necessary and compulsory to create their own account on the portal. Users shall be obliged – vis-à-vis the supplier – to take due care in using and keeping the password and the access code and shall be therefore responsible for all the consequences related to a possible illegal use, intentional or unintentional dissemination of the password or access code. The supplier shall reserve his right to suspend the necessary authorizations related to the password or access code until their restoration. Any refusal to provide said personal data entails the impossibility to finalize registration and enjoy the WEBARTEX services. If the Customer requests to pay by bank transfer or by credit card additional information may be collected such as the address to which payment must be sent; the number and date of expiry of the credit card and the information regarding the state of cheques, as well as the bank details. For the sake of completeness, it is to be recalled that in some cases (which are not customary practice in the ordinary management of this website) the company owning the WEBARTEX.com website can ask for information and data pursuant to article 157 of the Legislative Decree 196/2003, for the purposes of checking the treatment of personal data: in this case a reply is compulsory, otherwise administrative penalties can be imposed.

Data provided by the user on a voluntary basis

During registration, WEBARTEX may ask to provide – on a voluntary basis - a series of additional identification data, such as:

Telephone

Mobile phone

Fax

Website



VAT number

This information and data shall be treated by WEBARTEX - under an anonymous and aggregate form – to create general profiles of the service users with a view to better meeting their needs. The optional, explicit and voluntary sending of e-mails to the addresses indicated on this website entails the subsequent acquisition of the sender address, which is necessary to answer requests. At any time the customer can change his personal data by means of the related website in the personal area.

Terms and conditions for data treatment

Personal data are mainly treated in e-format and sometimes also in paper format, as is the case when the treatment is needed to prevent frauds on WEBARTEX.com. Most data and information will be kept on the WEBARTEX servers until the end of the contractual relationship (or for a longer period as laid down by law) only to allow the provision of the services requested, by adopting the proportionality principle for those data and information which do not need to be kept for the purposes of providing the services requested. After the account definitive suspension, all the personal data held by the portal shall be cancelled, except for:

- a. the personal data which must be necessarily kept to comply with a specific request by the relevant judicial authorities;
- b. the ID data of a user suspended indefinitely for infringements of the Agreement for Users (including the data related to the internal investigation procedures), which are kept to protect the WEBARTEX interests and prevent the user from registering again;
- c. the invoicing-related data.

Personal data may be treated by WEBARTEX without the user's express consent to fulfil specific obligations envisaged by laws, regulations and the applicable E.U. rules and regulations. Furthermore, in the cases identified by the Regulatory Authority for the protection of personal data, treatment shall be allowed to serve a WEBARTEX or third party's legitimate interest, such as the protection from frauds or other behaviours not in line with the Agreement for Users, as well as to claim and defend a right at judicial level. Conversely, a preliminary and express consent to the treatment of personal data shall be necessary for other commercial goals, and particularly for marketing, market research, activities to foster user loyalty and other commercial initiatives by third companies with which the Company has reached and/or will reach commercial agreements. With a view to protecting WEBARTEX and



minimizing fraud risks, each user may be assigned an internal evaluation code mainly based on the WEBARTEX models for online transactions: these codes shall be used exclusively by the WEBARTEX Customer Care, Regulations and Security Divisions and, under no circumstances, shall be disclosed to other users or third parties. With the user express consent, WEBARTEX can use these information and data to contact the customer and provide information which, in some cases, correspond to its own interests, such as targeted advertising banners, website management information, as well as communications related to the use of services, by giving personal consent to the treatment of personal data for these purposes during the registration phase. WEBARTEX may treat some personal data such as user ID and e-mail address to periodically send its Newsletter, with a view to provide information on the website novelties and the new services offered. The user, however, may refuse his consent to receive the WEBARTEX Newsletter both during subscription and at a later stage by answering to the e-mail received with the indication “unsubscribe”.

Data treatment purposes

Personal data and information are collected by WEBARTEX for purposes which are strictly linked to the services provided by the portal and may be treated for the following aims:

- in the framework of the website registration processes: WEBARTEX collects personal data by means of the related registration form in order to provide access services to dedicated areas and to send the WEBARTEXnews (e-mail messages including advertising, advertising material, internal announcements, commercial communications), where expressly requested;
- to provide customer care and assistance services, WEBARTEX collects personal data for the purposes needed to provide all information on the WEBARTEX.com services;
- in the framework of the requests for technical assistance services, WEBARTEX manages personal data to provide information on navigation problems, browser compatibility and viewing or loading of the WEBARTEX.com web pages. The technical data related to connections (log) are kept to allow the security checks required by law; improve the quality of the services offered and customize them. With a view to ensuring that personal data and information are always accurate and updated – and anyway relevant and complete – we ask users to report any change to privacy@WEBARTEX.com.



Scope for the communication of personal data

Within the limits and for the purposes set in the Privacy Rules, some personal data may be communicated by WEBARTEX to public and/or third parties such as:

- Community WEBARTEX: on the website the user is recognized by the Community members by means of the user ID or pseudonym;
- entities responsible for Data Treatment and Customer Care: access to personal data shall be allowed to the representatives of the WEBARTEX Customer Care, Regulations and Security Divisions, who are appointed as responsible for data treatment to support users in relation to the services offered by WEBARTEX; answer requests by the relevant judicial authorities to check behaviours not in keeping with the Agreement for Users (Terms & Conditions) and for invoicing requirements, always in compliance with current laws;
- communications to third parties: personal data may be made available to third companies which provide specific services on behalf of WEBARTEX, only when this is needed to perform a contract, for example to Banca Sella Spa, to perform the e-payment services by credit card. Personal data shall not be transferred abroad to countries other than the E.U. member states which cannot ensure people protection levels;
- external service suppliers: WEBARTEX shall reserve its right to collect some users' personal data and information under an aggregate form and communicate them - under an anonymous form for sectoral studies and market research – to marketing operators, corporate advisors and law firms (legal advisors, tax advisors, etc.);
- legal requests: WEBARTEX shall cooperate with public authorities to ensure compliance with law and the users' and third parties' rights, with specific reference to intellectual property rights (Directive 2004/48/EC of the European Parliament and the Council of April 29, 2004). Therefore, in case of a formal request and in compliance with the laws, personal data may be communicated to the relevant judicial authorities or any other public administration for State defence and security needs, for prevention, ascertainment or repression of civil, criminal and administrative offences. These public subjects are also competent for requesting and obtaining the customer personal details when this is needed or appropriate for investigations or enquiries related to the perpetration of frauds; information offences to the website detriment; infringement of intellectual property rights; information piracy actions or any other illegal activities, which may lay WEBARTEX or its users liable to legal, civil or



criminal liability. Upon a formal request by the above stated authorities, WEBARTEX may communicate the user ID, name, address, telephone number, e-mail, corporate name or aim: except for these cases, data on web contacts last for a maximum period of 10 (ten) days.

- banks and credit institutions, credit recovery companies, units evaluating the individuals' solvency: only in the case of disputes regarding unpaid invoices and, in more general terms, the management of the credit recovery dossiers, has WEBARTEX reached an agreement with Banca Sella to which some personal data may be possibly communicated. With reference to this aim, said company has been appointed "entity in charge of treatment pursuant to article 20 of the Privacy Code". Where necessary, the user may exercise access rights under article 7 of the Privacy Code by sending the request to WEBARTEX directly.

- Moreover, WEBARTEX shall collect personal data for purposes related to the request of information coming from journalists and media, or newsagencies, and the sending of the Press Letter, conditional upon the preliminary registration with WEBARTEX.com.

Failure to give consent

The failure to communicate that consent is given for the personal data treatment may be a legitimate and justified reason for not executing e-commerce transactions by WEBARTEX or third companies; in this case, no default may be blamed on WEBARTEX or third parties. The communication of wrong or incomplete data shall entail the user's full liability and shall hold WEBARTEX harmless of any liability for the consequent non provision of services. Conversely, the communication to WEBARTEX of additional data - other than the essential ones - for performing legal or contractual obligations or for providing specific services upon request shall be optional and shall not entail any consequence for the website use: the failure to communicate these additional data and information shall not entail any obligation or disadvantage for users.

Rights of the parties concerned

At any time the subjects to whom the personal data and information refer shall have the right to be confirmed or not that said data and information exist; to know their content and origin; to check their accuracy or ask for additions, updating or corrections, as well as their communication in an intelligible form (article 7 of the Legislative Decree 196/2003): this request shall be sent to WEBARTEX at the e-



mail address privacy@WEBARTEX.com. According to this same article, the customer shall have the right to ask for the total cancellation of the data provided; their turning into anonymous form or the block of the data and information treated as an infringement to law, including those that need not be kept in relation to the aims for which they have been collected or subsequently treated. Furthermore, the user shall have the right to obtain information on the ways and goals of the personal data treatment; the logic applied when treatment is carried out by means of e-tools; the IDs of the people responsible for data treatment and the representative appointed; the identification of the subjects or groups of subjects to whom personal data and information may be communicated or may get to know them, for example in their capacity as responsible for treatment, except for the case when this is impossible or entails a use of means which is clearly disproportionate in relation to the protected right. Customers, however, shall have the right to fully or partially oppose to:

the treatment of personal data regarding them - though relevant for the aims of data collection – for legitimate reasons;

the treatment of personal data regarding them for the purposes of sending advertising material; direct marketing, market research or commercial communications.

After registration, the user may check and change the information provided during that procedure including:

- the user ID or pseudonym;
- the e-mail address;
- the registration information such as name, company, tax code, address, city, nationality, zip code, telephone and fax numbers;
- the password;
- the information related to the methods and ways of payment.

By using the services of the portal and/or giving consent to registration, those who navigate on the website shall ensure that the personal data and information provided are accurate and shall commit themselves to updating them in case of changes. With a view to exercising the above stated rights, we ask to contact the Customer Care Division.



Direct Marketing

Thanks to a freely expressed consent, WEBARTEX may inform its own customers on the new products and services by resorting to marketing through direct e-mail (WEBARTEXnews), which is designed to developing an efficient relation strategy. In each newsletter received, the user has the possibility of cancelling his registration to these forms of communications through the link by accessing the personal area MyWebartex.

Security measures

WEBARTEX adopts specific security measures to protect data from the risks of destruction or loss – also accidental loss – unauthorized access by third parties or treatment not allowed or not in line with the collection aims laid down in the Privacy Policy. Nevertheless, WEBARTEX cannot ensure its users that the measures adopted for the purposes of website security and transmission of data may limit or rule out any risk of unauthorized access or data dispersion. With a view to protecting users, the Customer Care Division may adopt security standards which are among the best considering the current state-of-the-art, including “firewalls” and data transmission through SSL (Secure Socket Layers). WEBARTEX, however, ensures its customers - also when preliminary consent is not strictly necessary – that at any time they can exercise their right not to receive any longer communications linked to the use of particular services upon request, such as the WEBARTEXnews. WEBARTEX does not tolerate “spamming”, namely the undesired and not requested sending of commercial and advertising material and information. It is forbidden to send commercial or advertising e-mail messages to WEBARTEX users without their preliminary agreement; in this connection, customers are invited to report spamming cases occurred through the website or to connect with WEBARTEX, by contacting the Customer Care Division. Said WEBARTEX Division advises its customers not to disclose their password to third parties: should users decide to provide their own ID, password or information to third parties, they shall be deemed directly responsible for all the actions made by using them and WEBARTEX shall be held harmless of any liability in this regard. If - for whatever reason - the password is no longer usable, we advise you to change it immediately by accessing the personal area MyWebartex.



Cookies

WEBARTEX uses “cookies” as the automatic data collection method, which is part of its own operation, to optimize its own services and website to meet the specific needs and preferences of its own users. A cookie is a device which is transmitted to the user’s hard disk, thus allowing to associate it with the personal data it releases on WEBARTEX.com; it is also connected by our server and nobody can gain access to the information contained in it. The acceptance of the automatic collection procedures and the use of cookies are necessary to use the website and its services. When the cookies cancellation procedure is activated, you may not fully view some web pages or be supplied some services such as storing and visualization within the WEBARTEX web pages and probably you may be requested to enter the password many times during one same session. Cookies are used by WEBARTEX to allow to:

- enjoy some customized services;
- avoid the need to enter the password many times;
- provide targeted information according to the users’ interests during navigation;
- improve the website security, also through the prevention of illegal activities;
- conduct – under an anonymous and aggregate form – research into users’ interests and behaviours.

The following personal data will be stored in cookies:

- the URL of origin (both in the case when the URL is on WEBARTEX and when it is on other websites);
- the URL entered at later stage (both in the case when the URL is on WEBARTEX and when it is on other websites);
- the type of browser used;
- the IP address.

The use of the so-called session cookies (which are not stored permanently on the user PC and disappear when the browser is closed) is strictly linked to the transmission of session IDs (composed of casual numbers generated by the server), which are needed to allow safe and efficient website exploration. The so-called session cookies used in this website avoid the recourse to other information techniques, which may potentially harm the users’ navigation confidentiality and do not allow to acquire the user ID personal data.



Online advertising

In case of advertising spaces such as banners, buttons and pop-up windows adopted on our website, WEBARTEX does not record any personal detail such as names, addresses, telephone numbers or e-mail addresses, except for the formats (recall buttons, modules) used to contact the customer directly. Only anonymous user data and information are recorded temporarily, such as the operating system and the type of browser, as well as information related to the way in which users react to advertising (through click).

Links to other websites

WEBARTEX.com directly provides links to other websites to assist users in search and navigation and to facilitate the hypertext link on the Internet. These links do not imply any sharing of the content of the website which has activated the link, or any WEBARTEX liability in this regard. WEBARTEX does not control nor monitor these websites and their content and therefore it cannot be held liable for the content and rules adopted by them, also in relation to privacy and personal data treatment during navigation.

The practices of deep linking (hyperlink) and framing are forbidden. The same holds true for the fragmentation of parts or sections of the website and/or their incorporation into other websites. WEBARTEX shall reserve its right to interrupt or suspend – at any time – the website functionalities without having to shoulder any liability both in the case when this happens as a result of direct actions or omissions and in the case when this is attributable to third parties.

Amendments to these provisions

WEBARTEX shall reserve its right to amend these provisions on Privacy at any time, also considering the updating of the law provisions and regulations governing these matters. Amendments and updates to the WEBARTEX.com Privacy Policy shall be notified to users on the WEBARTEX.com Home Page as soon as adopted and shall be binding as soon as they are published on the website in this same section. They will be effective after 8 (eight) natural running days since their publication on the website or after 8 (eight) natural running days since the sending of an e-mail message to the users that have chosen this communication option.



Protection of minors

People younger than 18 years old cannot use the services provided by WEBARTEX: hence they shall not provide any personal data in the registration process. The Company shall not be liable for any access by minors to websites whose use is forbidden to them.

In case of questions or advice related to these provisions, we invite you to write to privacy@WEBARTEX.com.