



PRIVACY

INFORMATION ART. 13, Legislative Decree 30/06/2003, n. 196

Pursuant to Art.13 of Italian Legislative Decree No. 196 dated 30 June 2003 and in relation to personal data related to you and which will be the subject to processing, we inform of you of the following.

Under the law indicated, the processing of your personal data will be based on principles of correctness, legality, relevance, transparency and protection of your privacy and your rights.

1. PURPOSE OF DATA PROCESSING

Data Processing:

- a) is aimed at the activation of the services offered by the portal;
- b) is aimed at the collection of data for marketing purposes in order to send commercial communications including via e-mail;
- c) is aimed at the creation of a promotional database;
- d) can be used for sending communications, including email, on behalf of third party companies, customers, and clients;
- e) can be done for conducting market and statistical analysis, marketing, and to obtain preference information;
- f) can be used by Across for the completion of commercial promotional ends;
- g) can be used to identify individuals involved in possible legal offences only in case of specific requests and on behalf of the appropriate authorities.

2. DATA PROCESSING PROCEDURES

Data Processing:

- a) is done using the procedures or series of procedures indicated in Article 4 of the Legislative Decree

of 30/06/2003 Number 196: pertaining to data collection; registration and organisation; processing, including editing, comparison, and interconnection; use, including consultation, communication,



storage, selection, and extraction; blocking of communication, cancellation, destruction; security, and protection, including accessibility, confidentiality, integrity, and protection;

b) is carried out with the aid of electronic or otherwise automated means, with input

and collection of data in electronic databases owned by Across, which are used to carry out the procedures listed in a);

c) is also carried out by non-electronic means and archived in paper format;

d) is carried out directly by the controlling organisation, as well as possibly by third parties performing services for customers.

3. COOKIES POLICY

Cookies are text files that websites send to your computer, or other devices visitors use to connected to the Internet, which uniquely identify the visitor and save their browser information and settings.

Cookies are used to improve web sites, themselves, and to deliver services and functionality to customers. They can be used, in particular, to store information provided by the user and user preferences for the website in order to allow

Across to improve its services and website design. They can be shared with analysis providers. They may, moreover, allow for the provision of promotional information.

You can limit or disable the use of cookies through your browser. However, if you do, some features of the web sites may become inaccessible.

4. PROVISION OF PERSONAL DATA

Limiting the personal autonomy of the concerned party regarding their personal data, the provision of personal data can be:

a) required by law, regulation, or legislation;

b) strictly necessary for the activation and execution of services offered, as well as for meeting tax and accounting obligations;

c) optional for the purposes of carrying out information gathering activity, marketing, and promotion of services to the party concerned.



The data controller signifies that any error in the communication of personal data, which is deemed mandatory under a) and b) above, will make it impossible for the data controller to guarantee the respect of the contractual agreements for which this personal information was requested as well as

the resulting deficiencies resulting from these same agreements with regard to obligations required by law.

5. REFUSAL OF THE SHARING OF PERSONAL DATA

Any refusal by the concerned party to share personal information

a) in the case of the situations covered in point 4, letters a) and b) above, refusal renders it impossible to use the services offered by the portal;

b) in the situation covered in point 4, letter. c), it does not carry any consequences regarding the legal relationships that are in course, but it does preclude the possibility of participation in information, promotion, and other potential initiatives with regard to the concerned party.

6. Sharing of Data

a) Personal data may be disclosed to affiliates and/or subsidiaries, partner companies of Across, to third party societies that carry out activities on behalf of Across in outsourcing, to companies that provide commercial information and are authorised to access public offices, records, and reports, and to banks for purposes provided by law.

b) In that case, the identification data of the corresponding data controllers and of the potentially responsible personnel can be acquired at Across s.r.l. headquarters.

c) Furthermore, personal data may be communicated to public administrators in order to fulfil contractual and legal obligations.

d) Personal data may also be disclosed to associated companies and to service companies providing information or storage services.

e) Commercial communications may be sent through the web, mail, e-mail, telephone (SMS, MMS, telemarketing) and may concern the commodity-related categories below, in the case of companies belonging to the following sectors: communications and communications and technology products and services etc.;



Finance and banking: financial institutions, insurance, investment, social security etc.; free-time: publishing, tourism, sport, collecting, photography, hobbies, communications and entertainment, art, music etc.;

Distribution and trade: electronics, computer, image and sound, fashion, accessories, clothing, textiles, general stores, cosmetics and sanitary, chemical, pharmaceutical and biotechnology, agriculture and food, supermarkets, beverages, office supplies, furniture etc.;

Automotive: products and services related to cars, trucks, bicycles and motorcycles, trucks, mechanics and metallurgy etc.;

Energy and water: products related to electricity, hydrocarbons, gas, water and other utilities etc.;

NGOs and associations: products and services related to nonprofits, foundations, etc.;

Education, training, instruction, universities etc.;

Communication and services: advertising agencies, marketing, events, consulting, advertising, PR, advertising agencies, media centres, telecommunications, market research, etc.; mobile marketing agencies etc.;

Ecology and environment;

Construction, civil engineering and real estate products/services: construction, decorations, home design, real state agencies etc.;

Exhibitions and events etc.;

IT, Internet, e-commerce sites etc.

7. DISSEMINATION OF DATA

The personal information is disclosed to the persons indicated in point no. 6.

Any further communication with respect to those indicated above and any other additional disclosures will occur only with your explicit consent.

8. DATA CONTROLLER AND DATA PROCESSOR

The data controller is Across s.r.l., in the person of its legal representative pro tempore.

The identification data of the data controller for personal data can be acquired at the headquarters of Across s.r.l., at 303 Corso Moncalieri, Turin. You can request cancellation by writing to Across s.r.l. at 303 Corso Moncalieri Turin, 10131 or by sending an email to this purpose to: responsabileprivacy@across.it



9. RIGHTS OF THE INTERESTED PART

The art. 7/9/8/10 the Legislative Decree 196/2003 allows the interested party to exercise specific rights, among which are: the right to obtain, from the data controller or from those responsible for data processing, a confirmation of the existence or otherwise of their personal data and the making available of this data in an intelligible form; the right to know the origin of the data and the logic and purposes on which the processing of this data is based; the right to cancellation, anonymously

changing or blocking data processed in violation of the the law, as well as the updating, correction or, if interested, integration of data; the right to object, for legitimate reasons, to data processing. The full the provisions of art. 7 of the Legislative Decree 196/03 are given for your appropriate awareness:

1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning them, even

If not yet registered. This information must be communicated in an intelligible form.

2. The interested party has the right to be informed of:

a) the source of personal data;

b) the purposes and methods of processing;

c) the logic applied in the case of data processing with electronic instruments;

d) the identity of the data controller, data processors and the designated representative as per article 5, paragraph 2 of the Legislative Decree 196/2003;

e) subjects or categories of subjects to whom the personal data may be communicated or who may come to have knowledge of it as a designated representative in the territory of the state, managers, or agents.

3. The interested party has the right to obtain:

a) the updating, correction or, where interested therein, integration of the data;

b) cancellation, anonymous changing or blocking of data processed unlawfully, including data whose retention is not necessary for the purposes for which the data were collected or subsequently processed;

c) certification that the operations in letters a) and b) have been made aware, also in regard to their contents, to those to whom the data were communicated or disseminated, with the exception of the case in which such fulfilment is impossible or involves a manifestly disproportionate use of means with respect to the protected right.



4. The interested party has the right to be informed, completely or in part, of:

- a) the legitimate reasons for the processing of personal data, even if pertinent for collection purposes;
- b) the processing of personal data related to the ends of sending advertising or or direct selling material or for carrying out market research or commercial communication.

The undersigned, having read the information provided by the data controller in accordance with art. 13 of the Legislative Decree 196/2003 and having read the disclosures referred to in this law:

-gives their consent to the processing of personal data for the purposes of the conclusion and performance of the contract, indicated in the information that they have read, which is obligatory and necessary to enable the data controller and processor the correct execution of the relationship.

-gives their consent to the processing of personal data for the purposes of optional promotion and marketing, indicated in the information they have read.

-gives their consent that their personal data are processed and sold to companies that carry out activities on behalf of Across in outsourcing and partner companies of Across that provide commercial information.

-having read the informative note regarding the use of cookies, they authorise their use.

ANTI SPAM POLICY

What is spam?

In the context of electronic messaging, spam refers to unsolicited, bulk or indiscriminate messages, typically sent for a commercial purpose. Across has a zero-tolerance spam policy.

Automated spam filtering

Across's messaging systems automatically scan all incoming email [and other] messages, and filter-out messages that appear to be spam.

Problems with spam filtering



No message filtering system is 100% accurate, and from time to time legitimate messages will be filtered- out by Across's systems.

If you believe this has happened to a message you have sent, please advise the message recipient by another means.

You can reduce the risk of a message being caught by the spam filters by sending the message in plain text (i.e. no HTML), removing any attachments, and ensuring that your messages are scanned for malware before dispatch.

User spam

Across provides a facility that enables users to send [email messages / private messages] to others. Users must not use this facility to send unsolicited, bulk or indiscriminate messages, whether or not for a commercial purposes.

Receipt of unwanted messages from Across

In the unlikely event that you receive any message from Across or sent using Across's systems that may be considered to be spam, please contact Across using the details below and the matter will be investigated.

Changes to this anti-spam policy

Across may amend this anti-spam policy at any time by publishing a new version on this website.

Contact us

Should you have any questions about this anti-spam policy, please contact Across using the details set out below:

info@across.it

Tel:+39 011-7920826