

Annex to Service order No. 13 dated June 29, 2009

Notice regarding the handling of personal data

Under the provisions of Article. 13 of Italian Legislative Decree no. 196 dated June 30, 2003, please be advised that:

#### 1. PURPOSE OF THE HANDLING

Any personal data provided by third parties and acquired by the Chamber's database, both that indicated by laws and regulations and that which is a part of the scope of the optional activities in favour of the enterprise system, will be used exclusively for all of the Organisation's institutional purposes.

Pursuant to Italian Law 580/93, and implemented legislation, the Chambers of Commerce perform administrative and economic functions relative to the enterprise system, as well as functions delegated by the State and Regions, as well as any deriving from international agreements.

By law, The Chamber of Commerce is entrusted with storing, using computerised methods, the Enterprise Registry and the Administrative and Economic Repertoire (AER) Directory, as well as the Computerised Protest Registry.

What's more, for the same purpose of performing its institutional functions, the Chambers of Commerce manages, in accordance with the current regulations, registries, rolls, lists and directories of various natures, containing the data regarding physical persons, legal entities, as well as organisations and associations of every sort that perform significant activities for the enterprise and household system.

On the basis of specific Chamber Regulations, which may be viewed in the offices as well as on the Chamber web site [www.vt.camcom.it](http://www.vt.camcom.it), The Viterbo Chamber of Commerce also performs functions associated with the management of the suppliers of goods and/or services, the management/granting of contributions / subsidies, the management of the chamber's offices and spaces, as well functions regarding the management of its employees in accordance with the regulations and provisions which can be accessed on the Chamber's intranet network.

#### 2. HANDLING METHODS

The collection of the data may be performed either by those directly involved, or else by third parties, based on the specific circumstances.

The handling of the information, as well as, where indicated, any communications to the subjects indicated in this notice and the diffusion of the same, will take place with the use of manual, computerised and electronic instruments, in accordance with rationales which are strictly linked to the purposes of the handling itself.

Some of the handled data is of a sensitive and/or judicial nature and will be classified as such.

The confidentiality of the information is guaranteed by security measures which are suitable for minimising the risks of loss or destruction, even accidental, as well as unauthorised access or handling.

#### 3. REASONS FOR COMMUNICATION OF PERSONAL DATA

Should the acquisition of personal data take place as a result of legislative obligations or equivalent regulations, the communication of the personal data is to be considered mandatory and, therefore, the handling, communication and diffusion of the same may take place without the express consent of the parties in question.

On the other hand, the communication of personal data is to be understood as optional in the cases of use for statistical, promotional or research purposes, for participation in protests or demonstrations, or for the performance of arbitration proceedings, etc.

If the party in question should oppose the communication of this data, the only eventual consequence will be the impossibility to provide the requested service.

If the party in question should voluntarily communicate his/her information, the transmission of the same shall be considered as consent for the handling of the same, but only for the purposes described above.

#### 4. SUBJECTS OR CATEGORIES OF SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED AND THE SCOPE OF ITS DIFFUSION

Personal data which is subject to handling may be accessed by authorised Chamber employees and/or deputies, whose names are included in the annex to the provision of the Secretary General, updated annually for the appointment of those assigned to the individual handling operations.

The personal data subject to handling will also be entered into and managed within the computerised platform for the management of customised communications (CRM) and will only be used for the Chamber's institutional purposes which fall within its duties regarding the promotion of the territory and the development of the entrepreneurial system.

The data contained within the Enterprise Registry, the Administrative Economic Repertoire Directory (AER) and the Computerised Protest Registry, as well as that contained within the professional association registries, rolls, lists and directories of various natures, stored at the Chamber of Commerce, are public records and may therefore be diffused erga omnes.

The personal data entered into the aforementioned databases may be communicated to InfoCamere S.c.p.a. as the organisation responsible for their handling, as well as to other subjects that perform complementary and instrumental activities in support of that which is performed by the Chamber (ex. outsourcing companies, technical assistance companies, shipping companies and editorial graphics companies).

Since, in the case at hand, the data in question is entered into databases which are accessible to the public, it may be communicated or diffused for the Chamber of Commerce's institutional purposes, both in Italy and abroad, even outside of the European Community, nevertheless in compliance with the indications provided in articles 24 and 25 of the Code.

#### 5. RIGHTS REFERRED TO IN ARTICLE 7 OF THE CODE (ITALIAN LEGISLATIVE DECREE 196/2003)

Article 7 attributes specific rights to the concerned party.

In particular, the party may obtain the confirmation of the existence or non-existence of his or her personal data and have said data placed at his or her disposal in a comprehensible form.

The concerned party may also enquire about the origins of the data, as well as the method, the rationale and the purpose of its handling and may also request its cancellation, transformation into an anonymous form or else the blockage of

any data handled in violation of the law. In addition, he or she may request that the data be updated, corrected and/or supplemented and may oppose, for legitimate reasons, the handling of the same.

The rights referred to in Section 7, regarding personal data concerning deceased persons, may be exercised by those with specific interests, those acting on behalf of the person in question or those acting for family reasons worthy of protection.

For the execution of the rights referred to in Article 7, the concerned party may assign or delegate, in writing, other physical persons, organisations, associations or organisms.

The concerned party may also be assisted by a trusted person.

#### 6. INFORMATION REGARDING THE DATA CONTROLLER AND MANAGER

The Data Controller is the Chamber of Commerce Industry, Crafts and Agriculture of Viterbo, with offices in Via F.lli Rosselli No. 4, 01100 Viterbo.

Those responsible for the handling of the data are:

- The General Secretary, for the handling of hard copies or the handling of data with the use of computerised databases stored exclusively by the Chamber of Commerce of Viterbo and for the filing of the hard copy documents. The same General Secretary periodically updates the list of those assigned to the individual data handling operations;

-InfoCamere, joint-stock consortium company for the Italian Chambers of Commerce, with headquarters in Rome, P.za Sallustio, 21 and offices in Via G.B. Morgagni, 30/h, for handling operations performed with the use of computerised instruments and the filing of the hard copy documents with centralised banks;

-The following companies in the InfoCamere Group, each for the handling of the data contained in its relative databases: Infocert with headquarters in Rome, Via G.B. Morgagni, 30/H; IC Tecnology with headquarters in Padua, Corso \_Stati Uniti, 14; Infobusiness, with headquarters in Rome, Via G.B. Morgagni, 30/H; IC Outsourcing with headquarters in Padua, Corso \_Stati Uniti, 14; IC Service, with headquarters in Rome, Via G.B. Morgagni 30/H; EcoCerved with headquarters in Bologna Via E.Zago, 2 -Retecamere S.cons. a r.l., with headquarters in Rome, via Valadier, 42, for that which pertains to the activities performed by the same companies for the management of the data for the Chamber of Commerce database adhering to the CRM Network.

#### System Administrator

In compliance with that which has been ordered by the General Provision of the Guarantor on November 27, 2008, for the handling of personal data exclusively referring to the internal management of the Viterbo Chamber of Commerce, with Council resolution No. 7/30 dated June 15, 2009, Mr. Sergio Paccosi was appointed as System Administrator for Chamber computer services. For companies that handle the personal data in outsourcing, the Data Controller, upon specific and motivated request, will provide the names of the system administrators for the companies involved in the handling of the personal data.

Annex B) to Service order No. 13 dated June 29, 2009

#### 7. NOTICE IN ABBREVIATED FORM

To be used whenever deemed appropriate:

- for individual written and computerised communications
- or for recorded voice messages;

either at the through-switchboard  
or at the call centre (800-99.30.22)

Personal information provided to the Chamber Institution and inserted into the database will be used exclusively for the institutional purposes of the Institution itself.

Based on the specific case, the handling of the information will take place with the use of manual, computerised and electronic instruments

Personal data which is subject to handling may be accessed by authorised Chamber employees and/or deputies."