

THE SITE PRIVACY POLICY

THE PURPOSE OF THIS NOTICE

This page describes the management of the site with regard to treatment of the personal data of individuals using the site.

This disclosure is provided pursuant to art. 13 of Legislative Decree no. 196/2003 – Code for the protection of personal data – for parties using the web services provided by Sitti SpA at the address <http://www.sittispa.com> which is the home page of the official site of Sitti SpA.

The disclosure is provided solely with regard to the web site of Sitti SpA. It does not apply to other web sites that users may access via links.

THE "OWNER" OF THE PROCESSING PROCEDURE

Following consultation of the site, data relating to identified or identifiable parties may be processed.

The "owner" of the data processing procedure is Sitti SpA, headquartered in Via Cadorna, 69/73 - 20090 Vimodrone (MI) Italy. The data manager is Mr Davide Rovati.

PLACE OF DATA PROCESSING

Data processing associated with the site web services takes place in the offices of Sitti SpA at the above address, and is performed only by technical personnel of the office responsible for data processing, or by persons who may be engaged to perform occasional maintenance operations.

No data arising from the web service is disclosed or circulated.

Personal data supplied by users who ask to receive information is used solely for the purpose of providing the required service and is disclosed to third parties only when necessary.

TYPES OF PROCESSED DATA

Navigation data

The computer systems and software procedures used to operate this web site acquire, in the normal course of operations, certain personal data, transmission of which is implicit in use of Internet communication protocols. Such information is not collected in order to be associated with identified parties, but by its nature it could, through processing and association with data held by third parties, permit identification of users.

This category of information includes IP addresses or the domain names of the computers adopted by the users who view the site, the Uniform Resource Identifier (URI) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server reply (completed, error, etc.) and other parameters relating to the user's operating system and IT environment.

The information is used solely to obtain anonymous statistical information on use of the site and to check that the site is functioning correctly, and is erased immediately after processing. It may be used to ascertain liability in the event of hypothetical computer crimes perpetrated against the site: with this exception, at the present time data on web contacts is not retained for more than seven days.

Data provided voluntarily by the user

The optional, voluntary, explicit transmission of electronic mail to the addresses indicated on the site involves the subsequent acquisition of the address of the sender, in order to reply to requests, and also of any other personal data included in the message.

Specific summaries will be gradually reported or displayed in the site pages provided for specific services on request.

COOKIES

No personal data relating to users is deliberately acquired by the site.

Use is not made of cookies for transmission of personal information, nor is use made of any type of persistent cookie, that is, of user tracking systems.

Use of session cookies (which are not stored on a persistent basis on the user computer and are eliminated when the browser is closed) is strictly limited to transmission of session IDs (consisting of numbers generated randomly by the server) to enable secure, efficient navigation of the site.

VOLUNTARY SUPPLY OF DATA

Apart from navigation data as specified above, the user freely supplies his or her personal data to Sitti SpA to request information or other material.

Failure to supply such information may mean that it is not possible to receive the information requested.

PROCESSING METHOD

Personal data is processed with automated tools for the time strictly necessary to fulfil the purposes for which it is collected.

Special security measures are adopted to prevent the loss, illegal or improper use of data and unauthorised access.

RIGHTS OF INTERESTED PARTIES

The parties to whom the personal data refers may at any time obtain confirmation as to the existence or otherwise of said data, be apprised of its content and origin, verify its accuracy and request that it be updated, completed or amended (art. 7, Legislative Decree no. 196/2003).

In accordance with the aforementioned article, interested parties may request that data processed in violation of the law be cancelled, rendered anonymous or blocked, and in any case contest the processing of said data, for legitimate reasons.

All requests should be made to Sitti SpA.

Heading II – RIGHTS OF INTERESTED PARTIES

Art. 7. Right of access to personal data and other rights

1. Interested parties have the right to obtain confirmation as to the existence or otherwise of personal data referring to them, even if such data has not yet been registered, and to obtain communication of such data in an intelligible form.
2. Interested parties have the right to obtain information indicating:
 - a) the origin of the personal data;
 - b) the purpose and method of processing;
 - c) the logic applied in the event of processing by means of electronic devices;
 - d) the identity of the owner, the manager and the representative designated pursuant to article 5, par 2;
 - e) the parties or categories of parties to whom the personal data may be communicated or who may learn of such data in their capacity as the designated representative in the State of managers or nominees.
3. Interested parties have the right to obtain:
 - a) the updating, amendment or, when relevant, integration of data;
 - b) the cancellation, transformation into anonymous form or block of data processed in violation of the law, including data whose retention is not necessary for the purposes for which the data has been collected or subsequently processed;
 - c) a statement attesting that the operations as per letters a) and b) have been made known, also in terms of their content, to the parties to whom the data has been communicated or circulated, except in cases where compliance is impossible or requires use of means that is manifestly disproportionate to the right being safeguarded.
4. Interested parties have the right to contest, in whole, or in part:
 - a) for legitimate reasons, the processing of personal data referring to them, even if such data is pertinent to the purpose for which it has been collected;
 - b) the processing of personal data referring to them for the purpose of forwarding advertising or direct sales material or for market surveys or marketing communications.

Art. 8. Exercise of rights

1. The rights as per article 7 are exercised through a request made without formalities to the owner or manager, directly or through a nominee, and an appropriate response is provided without delay.
2. The rights as per article 7 may not be exercised with a request to the owner or the manager or with recourse pursuant to article 145, if the personal data is processed:
 - a) pursuant to decree law no. 143 of 3 May 1991, converted, with amendments, by law no. 197 of July 1991 and subsequent amendments, regarding money laundering;
 - b) pursuant to decree law no. 419 of 31 December 1991, converted, with amendments, by law no. 172 of 18 February 1992 and subsequent amendments, regarding support for the victims of attempted extortion;
 - c) by parliamentary commissions of inquiry set up pursuant to article 82 of the Italian Constitution;
 - d) by a public party other than public business entities, on the basis of specific provisions of law, exclusively for purposes relating to monetary and currency policy, the system of payments, the control of banking and financial brokers and markets, and also to safeguard their stability;
 - e) pursuant to article 24, par 1, letter f), limited to the period during which they could effectively and concretely prejudice defence investigations or the exercise of rights in judicial hearings;
 - f) by providers of electronic communication services accessible to the public relating to incoming telephone calls, unless this could effectively and concretely prejudice defence investigations as per law no. 397 of 7 December 2000;
 - g) for reasons of justice, at judicial offices of any order and degree or the Consiglio superiore della magistratura or other self-governing bodies or the Ministry of Justice;
 - h) pursuant to article 53, without prejudice to law no. 121 of 1 April 1981.
3. The Guarantor, also in response to instances from the interested party, in cases as per par 2, letters a), b), d), e) and f) acts in accordance with articles 157, 158 and 159 and, in cases as per letters c), g) and h) of par 2, acts in accordance with article 160.
4. Exercise of rights as per article 7, when not relating to data of an objective nature, may take place unless it concerns the rectification or integration of personal data of an evaluative nature, referring to judgements, opinions or other forms of subjective valuation, and the indication of conduct to be assumed or decisions to be taken by the processing owner.

Art. 9. Method of exercise

1. The request to the owner or to the manager may also be sent by registered letter, fax, or electronic mail. The Guarantor may identify another appropriate system using new technological solutions. With regard to exercise of the rights as per article 7, pars 1 and 2, the request may also be made orally and in that case the owner or manager makes a brief note summarising the request.
2. In exercising the rights as per article 7 the interested party may confer, in writing, mandates or powers of attorney to natural persons, bodies, associations or organisms. The interested party may also be assisted by a trustworthy person.
3. The rights as per article 7 referring to personal data concerning deceased persons may be exercised by parties with a proprietary interest, or acting to safeguard the interested party or for justifiable reasons of family protection.
4. The identity of the interested party is verified on the basis of appropriate elements of evaluation, which may include available deeds or documents or the exhibition or attachment of a copy of an identifying document. A person who acts on behalf of the interested party exhibits or attaches a copy of the power of attorney or mandate underwritten in the presence of an official or underwritten and presented together with a non-authenticated photocopy of an identity document of the interested party. If the interested party is a corporate person, a body or an association, the request is presented by the natural person legitimately entitled to do so under the terms of the respective by-laws or regulations.
5. The request as per article 7, pars 1 and 2, is made voluntarily freely and without constraints and may be renewed, subject to the existence of justified motives, at an interval of not less than ninety days.

Art. 10. Response to the interested party

1. To guarantee effective exercise of the rights described in article 7, the processing owner is required to adopt suitable measures designed specifically:
 - a) to facilitate access to personal data by the interested party, including use of computer programs that select the data relating to individual identified or identifiable interested parties;
 - b) to simplify procedures and reduce the time taken to respond to interested parties; this also applies to offices or services responsible for relations with the public.
2. Data is retrieved by the manager or nominees and may be verbally communicated to the applicant, or provided for viewing by means of electronic instruments, providing that in this case comprehension of the data is practical, in respect of the quality and quantity of information. Upon request, the data is transposed on to paper or on to a computer support, and transmitted telematically.
3. Unless the request refers to a specific instance of processing or to specific personal data or categories of personal data, the response to the interested party includes all personal data relating to the interested party that has been processed by the owner. If the request is made to a health professional or to a health body, the response must be compliant with article 84, par 1.
4. When data retrieval is particularly difficult, the response to the interested party may take the form of the exhibition or delivery of copies of instruments and documents containing the personal data requested.
5. The right to obtain communication of the data in an intelligible form does not refer to personal data relating to third parties, unless the extraction of the processed data or the elimination of certain elements makes the personal data relating to the interested party incomprehensible.

6. Data is communicated in an intelligible form, including use of comprehensible handwriting. If codes or abbreviations are used, parameters are provided, if necessary through nominees, to aid understanding.

7. When, following a request as per article 7, pars1 and 2, letters a), b) and c), existence of data referring to the interested party is not confirmed, a contribution may be requested towards expenses that does not exceed the costs incurred to conduct the search for the specific request.

8. The contribution as per par 7 may not in any case exceed the amount determined by the Guarantor with a general ruling, who may establish a lump sum with regard to cases where data is processed electronically and the reply is supplied verbally. With the same ruling the Guarantor may establish that the contribution may be requested when the personal data is on a special support reproduction of which is specifically requested, or when one or more owners employ significant resources to manage the complexity or the entity of the requests and the existence of data concerning the interested party is confirmed.

9. The contribution as per pars 7 and 8 may be paid through a bank or post office, or through a payment card or a credit card, where possible on receipt of the response and in any case not more than fifteen days after the response.