

Gravellona Toce (VB), March 31 2009.

Object: Information note in compliance with art. 13 of the Law Decree 196/03 "Personal data protection code"

To Customers/Suppliers

Preamble

Under the terms of Law Decree 196/03 "Personal data protection code" (herein "Code") Gmm S.p.A. as Owner of the processing, has to provide information as to the use of the personal data of your Company.

Personal data source

The data we own, collected directly from the owner, will be processed in compliance with the regulation in force and anyway with the due confidentiality.

Purpose of the processing

The collection and namely the processing of personal data has the exclusive aim of adequately complying with the fulfillments connected to the implementation of the economic activity of our company and specifically for:

- fulfillment of contractual obligations;
- fulfillment of specific requests of the data subject before entering into the contract;
- execute and fulfill obligations provided for by the law, by regulations and community regulations;
- fulfillment of tax or accounting obligations;
- requirements in terms of management, operations and reliability/solvency control;
- dispute managing;
- commercial and marketing purposes, sending advertising material concerning products or services similar to those object of the sale.

Processing modes

Concerning the above purposes, personal data processing occurs by non automated, automated and IT means with a logic strictly connected to the purposes and, anyway, in a way to guarantee safety and confidentiality of the data in compliance with the Code.

Nature of the collection

The collection of personal data is compulsory as well since legal and tax fulfillments have to be performed and the refusal to provide such data will entail the impossibility to start relationships with our company.

Communication and disclosure

Personal data and the relative processing will be the object of communication to companies and/or external consultants for the implementation of economic activities (commercial, managing, economic and financial information collection, management of information systems, insurance, bank or non bank brokerage, factoring, managing the mail shipping, envelop packaging and sending, managing and protecting credit) or to comply with legal standards (practices of accounting experts, notaries, lawyers, Inland Revenue Office). Data will not be disclosed.

The bodies that may know your data are the manager of data processing and the following categories of processing management bodies: Administrative Direction, Administration and Staff, Commercial Office, Procurement/Customer care/technical office, After-sale Technical Customer Care, Production, Technical Direction, Warehouse operators, Presidency.

Data subject rights

You can ask to the Privacy Service to the data processing manager for your data check and their integration, update, or modification and/or in order to exercise the other rights under art. 7 of the Code (attached).

Namely you can object at any moment, always through the Privacy Service, to the processing of your data for the dissemination of advertising material.

Processing manager

GMM S.p.A. is the owner of data processing, it is based in via Nuova, 155 - 28883 Gravellona Toce (VB) - The Manager of the Processing is Mr. Lagostina Giovanni domiciled for this post at the offices of the owner.

Art. 7 d.lgs. 196/03 (Right to Access Personal Data and Other Rights)

1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him/her exist, regardless of their being already recorded, and communication of such data in intelligible form.
2. A data subject shall have the right to be informed of:
 - a) the source of the personal data;
 - b) the purposes and methods of the processing;
 - c) the logic applied to the processing, if the latter is carried out with the help of electronic means;
 - d) the identification data concerning data controller, data processors and the representative designated as per Section 5 (2);
 - e) the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative in the State's territory, data processor or person in charge of the processing.
3. A data subject shall have the right to obtain
 - a) updating, modification or, where interested therein, integration of the data;
 - b) erasure, transformation into anonym form or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
 - c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected
4. A data subject shall have the right to object, in whole or in part,
 - a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
 - b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.