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PURSUANT TO ITALIAN LEGISLATIVE DECREE 196/2003

Dear customer, we hereby wish to inform you that Italian Legislative Decree n° 196 of 30th June 2003 (“Code governing the protection of personal data”) provides for the protection of persons and others in respect of the processing of personal data, such as data processed within the scope of our activity through the internet site <http://www.axeltechnology.com> (“Site”). If you continue you web surfing and/or submit your e-mail to the Site, it’s implied that you’ve read and accepted this privacy policy.

Pursuant to the above legislation, the processing of your neutral personal data, provided personally upon commencement of the agreement or gathered by means of telephone or personal communications, shall be based upon principles of probity, legality and transparency and protection of your confidentiality and your rights. Consequently, pursuant to article 13 of the Legislative Code, we wish to provide you with the following information:

1. The purpose and manner of data processing

Your personal data has been provided to us and will be processed solely for the following purposes:

- a) to fully perform all contractual obligations and/or your request (e.g. information or newsletter);
- b) to enter data records in electronic databases, also for statistical purposes;
- c) for bookkeeping purposes, if needed by your request;
- d) for managing revenue collection and payments, if needed by your request;
- e) for fulfilling the obligations required under civil law and fiscal legislation, regulations, European Union rules and instructions given by authorities legally entitled to do so, and by supervisory and oversight bodies.

You can be sure that processing of your personal data will be carried out by means of hardcopy and electronic media by the data controller and by data processing agents at the data controller’s registered office, in compliance with all precautionary measures providing for security and confidentiality, respect for rights and fundamental freedoms and the dignity of the data subject. Such data shall be stored for a period of time not exceeding the period required for the purposes for which the data has been collected and subsequently processed.

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Furthermore, you can be sure of a high level of protection of your rights and freedoms within the framework of a process designed to simplify, harmonise and render more efficient the procedures provided for the exercise of same on your part, as well as the fulfilment of obligations on the part of the data controller.

2. The type of data collected and the consequences of any change to provision of same

Provision of your data is essential for points a) – e) mentioned above in article 1, as any failure to provide such data will automatically make it impossible for us to fulfil our requested contractual obligations and/or to let you surf the Site and/or reply to your online questions and/or send you the requested newsletter, depending on your use of the Site.

3. Communication and dissemination of data

For the purposes of and according to such timeframes as are strictly necessary and indispensable for performing the above-mentioned agreement, your personal data may be provided to:

- to all individuals and legal entities (for example law, administrative, tax firms and shipping and courier services, electronic data processing centres etc) in all those cases where communication of such data becomes necessary for the above-mentioned purposes and in order to carry on economic and institutional activities;
- to banks and similar intermediaries for handling revenue and payments;
- to organisations coordinating, supervising and handling Internet networks and national and foreign networks;
- to our specially designated temporary members of staff and employees within the framework of their related tasks.

In all cases, processing shall be conducted in accordance with procedures which can ensure security and confidentiality.

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If necessary, for the same purposes, the data may be transferred outside Italy, but always within the European Union.

The aforementioned data shall not be disseminated (in accordance with the meaning of article 4 subparagraph m) Italian Legislative Decree 196/2003.

4. Types of data processed

Browsing data

During normal use, the electronic systems and software procedures enabling the Site to operate, acquire certain personal data and transmission of same is implicit in the use of Internet communication protocols.

By their very nature, such information (known as log information) could make it possible to identify you as a user by means of electronic processing and associations with other data, although such data is not collected for the purpose of associating it with identified users. These types of information include IP addresses, type of browser used, the origin page address, the date and time of the request and other parameters which could potentially identify your IT environment.

The data indicated above is used solely for storing information to monitor users' operations for statistical purposes regarding browsing within the Site and proper functioning of same; furthermore it is used anonymously (without automatic association with any other information provided by the user). Such use shall be made for specific legitimate purposes regarding technical storage for the timeframes that are strictly necessary to transmit a communication, for statistical purposes or to provide a specific service requested by you.

Data voluntarily supplied by you (Contacts/Newsletter)

The elective, explicit and voluntary sending of e-mail messages to the addresses posted on the Web Site or any communication sent through the "Contacts" or "Newsletter" section entail the subsequent acquisition of the sender address, which is necessary to answer any queries or provide the requested newsletter, as well as of any other personal information included in the message.

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Registered users

All users registering on the Site provide personal/business data and shall be assigned a user ID and password which corresponds uniquely to the user and which shall be used exclusively by the Site to allow for the contractual relations as requested by the user.

Cookies

- a) With regard to cookies, personal data may be acquired by the Site according to Cookies policy
<http://ecommerce.axeltechnology.com/cookiespolicy.pdf>

5. The data subject's rights

At any time the data subject may exercise his or her rights with regard to the data controller pursuant to article 7 of Italian Legislative Decree n° 196 of 30 June 2003, which includes obtaining information as to: whether or not there is personal data concerning him/her, even if such data has not yet been registered, as well as communication of such data in a form which is legible; the source of personal data; the purpose and manner of data processing; the logical system applied in the event of processing undertaken with the aid of electronic systems; details allowing identification of the data controller, the data managers and the designated representatives; individuals or entities or categories of individuals or entities to whom personal data may be communicated or who may gain knowledge thereof in their capacity as designated representative in Italy, data managers or data agents; updating, correction, and, when requested, completion of data; deletion, anonymization or blocking of data processed in breach of the law, including data which it is not necessary to preserve in respect of the purposes for which the data is collected or subsequently processed;

The data subject is entitled to challenge, either wholly or partially:

- a) for legitimate reasons, processing of their personal data, even though such processing may be pertinent to the reason for which such data is collected;
- b) processing of personal data concerning him/her for reasons connected to sending publicity or direct sales material or for processing personal data for purposes of sending advertising material or direct sales material to carry out market research or other commercial communications.

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6. The Data controller

The data controller in respect of exercise of your rights (for any verification, in particular with regard to the provisions of article 7 of Italian Legislative Decree 196/2003) is as follows: AXEL TECHNOLOGY S.R.L. whose registered office is in Via Caduti di Sabbiano, 6, 40011 – Anzola Dell'Emilia (BO) – Italy, VAT number 01735031203, email privacy@axeltechnology.com, fax +39051736170.