

# Ooros Privacy

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1st January 2004 has become effective the Decree 196/03 (published on the G.U n. 174 of the 29/7/03) that introduces the new "Code in matter of Personal Data Protection". In accordance with the art. 13 of such regulation, any Company, as Responsible of the Processing of personal data, is bound to supply suitable information regarding the management and processing of the personal data.

The provisions provide that those concerned, whose personal data are subject to processing, where processing means: "any operation or set of operations, carried out also without the aid of electronic tools, concerning the collection, recording, organization, maintenance, consultation, elaboration, modification, selection, extraction, comparison, use, interconnection, block, communication, diffusion, cancellation and destruction of data, even if not recorded in a data bank", are informed in advance as to the following points.

## Origin of personal data.

Personal data of users of computer systems, mobile telephony, management services of authentication and authorizations of automatic payment processes, amusement and on-line informations directly offered from Ooros or on behalf of a third party, are generally maintained at registries and public records, at the stakeholder by means of web channels and mobile telephony or legally shared databanks at public and/or private third parties, self-employed holders of data handling authorized by the customer.

Identification and personal data collection can also take place by querying public databanks (online and paper phonebooks, web site visits, etc.), through databanks queries at any linked or affiliated company or during online applications employment and by the customers themselves.

## Sensitive personal data

Our Company, in the accomplishment of its own activity, does not collect any sensitive data. In few exceptional cases our company can be aware (passive data), save and handle personal data defined as "personal sensitive data" by the Decree no. 196/2003:

(Art. 4, paragraph 1, letter d) defines as sensitive data: "the personal data suitable to reveal the racial and ethnic origin, the religious, philosophical beliefs or of other kind, the political opinions, the adherence to parties, unions, associations or organizations of religious, philosophical, political or trade-union nature, as well as the personal data suitable for revealing the state of health and the sexual life").

For the processing of such data the Law establishes a specific manifestation of consent contained in the specific Module. The data processing could not take place without the previous consent of the person concerned.

## Purpose of the data processing

The personal data provided by customer directly as person concerned or through thirds parties, are processed for purposes relating to:

- Proposals, foundation, continuation and execution of contractual relationships relating to the services of assets supply.
- Notification services of taxes, fees and license payment.
- Collection, storing, billing and emission of other commercial documents, data elaboration for accounting, administrative and management purposes, etc. .

In particular we inform You that:

- a) Data are processed in relation to the contractual requirements and the consequent fulfilments of legal and contractual obligations, as well as to achieve an effective management of the commercial relationships;
- b) Data are processed in relation to the contractual agreements with Public Institutions, Agencies / Companies / Enterprises whose validity regulates the matter of commercial legislation;
- c) Data could be transmitted to the above mentioned subjects, provided that they will always have to be made available to the Inspection, Control and Justice Authorities, during however the period of the time of their conservation;
- d) The above mentioned data could be transmitted electronically or on paper by our processing system, for administrative, organizational, insurance, legal, and internal and statistical control purposes