

DATA PROCESSING NOTICE

This page provides the ways and means of managing this Website in connection with processing the personal data of the users who access the Website, as well as the methods and purposes of processing such personal data.

This notice is also made available, in accordance with Article 13 of Legislative Decree 196/2003, to the persons who interact with the Web services that can be accessed electronically through the www.newtronic.it Website.

This notice concerns only the Website at issue: it will not apply to any other Website the visitors might access through our links, for which New-Tronic S.r.l. will in no case be responsible.

TYPE OF PROCESSED DATA

Internet browsing data

The computer systems and the software procedures employed to run this Website acquire, during their normal operation, some personal data the dissemination of which is implicit in the use of Internet communication protocols. These data are not gathered in order to be associated with the concerned persons identified: yet, they might, owing to their very nature – and by processing and relating to data owned by any third party – make it possible to identify the individual users. This class of data includes the IP addresses or the domain names for the computers by means of which the users get connected to the Website, as well as such other data as the URI (*Uniform Resource Identifier*) addresses for the requested resources, the request time, the method of submitting the request to the server, the size of the file obtained in reply, the numeric code specifying the status of the reply notified by the server (i.e. OK, error, etc.) and also any other parameter concerning the user's computer environment and operating system. These data are only used to collect anonymous statistical information about how the Website is used and, also, check the correct operation of the same (the data will be immediately deleted after they are processed). However, these data might be used to check for any person's responsibility in case of possible computer crimes (i.e. cybercrimes) damaging the integrity of the Website.

Data submitted intentionally by the user

The optional, explicit and intentional transmission of e-mail communications to the addresses specified in this Website, as well as the filling-in of forms in order to submit specific requests (e.g. subscribing to newsletters, making requests for information and/or requests for services and offers, etc.) entail the subsequent acquisition of the sender's address (in order to reply to the sender's requests) as well as of any other personal data entered in the communication or form. Specific summary notices are shown or displayed in the Website pages intended for special "on-request" services.

REFUSING TO SUBMIT PERSONAL DATA

Apart from the provisions applying to the Web browsing data, the user can freely decide by themselves to submit the personal data specified in the request forms (or specified in any case in the contacts to request the transmission of information materials or of any other communication). Failure to submit the personal data may make it impossible for the user to receive the requested items.

DATA PROCESSING METHODS

The data are mainly processed by means of electronic and computer devices and are stored both through electronic means and as hard copies as well as any other suitable means, in accordance with the basic safety requirements laid down by the Technical Specifications in relation to the basic safety measures (cf. Annex 'B' to the Privacy Code). Special safety measures have been taken in order to prevent data loss, illegal or incorrect use of data and unauthorized access.

We also inform you that, in order to guarantee full service, our portal includes a number of links that are not managed by our company. Therefore, New-Tronic S.r.l. will not be liable for every and any errors, contents, cookies, illegal and/or immoral contents, advertising messages, banners or files not conforming to the laws and regulations in force and to the privacy laws, which might be found in the Websites we refer to. In order to improve our services, we will really appreciate any suggestion or notification of yours, concerning any possible malfunction, improper use or abuse, to the e-mail address below:

fgallina@newtronic.it

PURPOSE OF DATA PROCESSING

The data will be processed in order to:

- make it possible to access the public and/or reserved sections of the Website;
- implement the activation and maintenance of the subscribed on-line services (if any);
- manage the purchase orders;
- process and file documents away, in order to draw up the accounting papers;
- comply with every and any obligation laid down by the laws and regulations;
- defence the Principal before a court;
- send administrative, promotional or sales information materials;
- allow continuous monitoring of the efficiency of the proposed services.

ENTITIES AND PERSONS WHO MIGHT RECEIVE THE USERS' PERSONAL DATA

The personal data in relation to the data processing dealt with herein may be also transmitted to entities or persons who will be entitled to access the personal data of any user by virtue of law regulations or any other secondary and/or EU regulations and standards. Furthermore, these data may be transmitted and disseminated to the Internet operators employed by New-Tronic S.r.l. to manage their own domains. The gathered data may be disseminated both in Italy and abroad.

CONCERNED PERSON'S RIGHTS

With reference to the personal data processing, pursuant to Article 7 ("*Right of access to the personal data and other rights*") of the Privacy Code, the concerned person will be entitled to:

1. be informed about the existence (if any) of personal data regarding the concerned person themselves (even if such data have not been recorded yet) and also receive the same in an intelligible form;

2. receive indications of the following:

- a. the origin of personal data;
- b. the purposes and methods of data processing;
- c. the logic applied in case the data are processed by means of electronic means;
- d. the personal identification details of the Principal, the managers in charge and the representative appointed in accordance with Article 5, paragraph 2;
- e. the entities and persons (or the classes of entities and persons) who might receive or learn about personal data, due to such entities or persons being the appointed representatives in the relevant countries, or managers in charge or appointees;

3. obtain the following:

- a. the update, correction and integration (i.e. when the concerned person is interested in this) of personal data;
- b. the deletion, conversion to an anonymous form, or the block of the data that have been processed by breaching the law, including the data that do not need to be stored in relation to the purposes for which such data have been collected or subsequently processed;
- c. a statement certifying that the operations described in paragraphs *a)* and *b)* above have been communicated, also as far as their contents are concerned, to the persons to whom the data have been communicated or disseminated, except when such a fulfilment either proves to be impossible or entails a manifestly excessive use of means and resources compared to the right to be protected;

4. object (either entirely or in part) to:

- a. the processing of personal data regarding the concerned person themselves (though these data are relevant to the data collecting purposes), due to legitimate reasons;
- b. the processing of personal data regarding the concerned person themselves, for the purpose of communicating advertising or direct selling materials, or of carrying out sales information surveys or market research.

PRINCIPAL IN CHARGE OF DATA PROCESSING

The Principal in charge of data processing is the NEW-TRONIC S.r.l. company, having its main office at Via Thures 36 – 10143, Turin (Italy).

To exercise the above-mentioned rights as laid down by Article 7 of the Privacy Code, the concerned person will have to send an e-mail communication to the following address: fgallina@newtronic.it

The list of the managers in charge of data processing and the managers in charge of outsourcing data processing is available for reference at our main office in Via Thures 36 – 10143, Turin (Italy).

COOKIES

Cookies are small pieces of data (text lines) that are entered into the hard disk of a computer (or equivalent device) by the on-line service provider, to the Internet Website visitors. Cookies may collect information about the visitors' habits when accessing a Website, by recording the activities performed by their own computer (or equivalent device) in connection with the concerned Website (e.g. when buying on-line).

Cookies can be classified as follows:

Proprietary cookies

Proprietary cookies are saved directly to the computer (or equivalent device) and may include both the session cookies and the persistent ones (see below). Proprietary cookies are used to follow the steps made by the visitor's computer (or equivalent device) as the visitor browses through our Website, for instance for analysis purposes.

Third-party cookies

Third-party cookies are managed by third-party entities or persons that may collect and trace some Web browsing data. This Website makes use of the Google Analytics service (described below in the "Statistical and Web browsing data collected by third parties" paragraph).

Session cookies

The time elapsing between the instant when the Internet browser is opened and the instant when it is closed is referred to as "browsing session". Session cookies are stored into the visitor's computer (or equivalent device) during a browsing session; yet, they expire and are normally removed at the end of a browsing session.

Persistent cookies

Persistent cookies are stored into the visitor's computer (or equivalent device) during a browsing session; yet, they remain in the computer (or equivalent device) following the end of the aforesaid browsing session (e.g. password registration). Persistent cookies allow the Websites to recognize the visitor's computer (or equivalent device) when the latter is used again to access one of our sites, following the end of a browsing session and upon the start of a new one, in order to essentially help the visitor to quickly get connected to our Website.

The portal makes use, for reasons of a strictly technical, computer safety nature, of the following types of cookies:

- session cookies;
- third-party cookies, for the statistic data concerning the access to this portal.

STATISTICAL AND WEB BROWSING DATA COLLECTED BY THID PARTIES

This Website makes use, as customary on the Internet, of statistical analysis tools made available and managed by third parties that may collect and "trace" some browsing data.

It should be pointed out that a very large number of Websites, both in Italy and abroad, make regular use of such "outsourced" technologies and solutions, yet very few of them report this piece of information in their "Privacy Notices". We at New-Tronic S.r.l. have always tried to do it and inform the visitors to our site as correctly and clearly as possible; in any case, we are available for any further information or explanation you may request.

These data are collected by companies other than the Website administrator, by means of different tools from the ones available to the latter; therefore, the data are not physically available to New-

NEW-TRONIC srl

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ASSISTENZA TECNICA: (39) - 011 - 403.34.58
URL: <http://www.newtronic.it> E-MAIL: info@newtronic.it



APPARECCHIATURE E SISTEMI SPECIALI
PER LA FORMAZIONE TECNICA E L'INDUSTRIA

EQUIPMENT AND SPECIAL SYSTEMS
FOR TECHNICAL TRAINING AND INDUSTRY



Tronic S.r.l. and the latter can only refer to them (that is to say, New-Tronic S.r.l. cannot modify or delete the data by themselves). As far as these operations are concerned – and to get a thorough knowledge of the Privacy Policy applying to said data – the user will have to contact the Principal, i.e. the company that directly provides the statistical service used.

Any request in connection with the data concerning the processing shall be made to the Principal. Below is the list of the tools owned by third-party entities and used in this Website:

- Google Analytics

The Internet addresses below may help you to better understand the Privacy Policy implemented by Google Analytics:

- o <http://www.google.com/analytics/terms/it.html>
- o <http://www.google.com/privacypolicy.html>