

INFORMATION PURSUANT TO ART. 13 OF EU REGULATION NO. 679/2016

Specifically with regard to the personal data as defined by art. 4, paragraph 1 no. 1) of EU Regulation no. 679/2016 (hereinafter, the "Regulation") that regard you as the "Data Subject", the undersigned company **CLEVERTECH S.p.A** (tax ID and VAT no.: 01307860351), represented by its pro tempore legal representative, with registered office in Cadelbosco Sopra (RE), via Giacomo Brodolini 18/A, in its capacity as "Data Controller" pursuant to art. 4 paragraph 1 no. 7) of the Regulation, provides you with the following information that will be valid and effective as of 25.05.2018.

1. Nature and type of your data collected and processed.

1.1. Your data subject to processing is exclusively categorised as "personal data" pursuant to art. 4, paragraph 1 no. 1) of the Regulation ("*any information relating to an identified, or identifiable, natural person (the "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*").

2. Information on the "Data Controller".

2.1. The "Data Controller" for the processing of your personal data pursuant art. 4 paragraph 1 no. 7) of the Regulation is the company **CLEVERTECH S.p.A.** (tax ID and VAT no.: 01307860351), represented by its pro tempore legal representative, with registered office in Cadelbosco Sopra (RE), via Giacomo Brodolini 18/A, which you may contact at: +39 0522 911330 postmaster@clevertech-group.com

2.2. Please note that any changes or updates in the data relating to the party mentioned above shall be appropriately published in the Privacy section of the website of the undersigned Data Controller.

3. Purpose of the data processing.

3.1. In compliance with art. 5, paragraph 1 letter b) of the Regulation, please note that your personal data will be collected and subsequently processed for the following purposes:

- a. Execution of precontractual activities and subsequent formalisation of a contract to which you, as the "Data Subject", are party, as well as for the execution of the resulting legal and contractual obligations or to request assistance and information about the products marketed;
- b. Marketing and/or advertising activities, to be carried out with different methods (for example by sending newsletters via email, invitations to webinars, sending commercial offers and promotions).

3.2. The purposes described above make the processing in question lawful pursuant to and in accordance with art. 6, paragraph 1 letters b) and c) of the Regulation.

4. Nature of consent to the processing of your data.

4.1. Any consent you provide to the processing of the data described in more detail in art. 1.1. of this disclosure for the fulfilment of the purposes pursuant to point a) of art. 3.1. above is compulsory in nature; therefore, if you refuse to provide consent to the processing in question, it will not be possible to start precontractual negotiations or start and continue the contract between you and the undersigned Data Controller.

4.2. Any consent you provide to the processing of the data described in more detail in art. 1.1. of this disclosure for the fulfilment of the purposes pursuant to point b) of art. 3.1. above is optional in nature; therefore, if you refuse to provide consent to the processing in question, there will be no type of consequence with respect to the precontractual negotiations and the subsequent formalisation of the contract between you and the undersigned Data Controller.

5. Scope of communication and dissemination of your data.

5.1. In compliance with art. 13, paragraph 1 letter e) of the EU Regulation, we inform you that your data described in more detail in art. 1.1. above of this disclosure may be communicated or transferred by the undersigned Data Controller to third parties with registered office in the European Union or in countries outside the EU deemed adequate pursuant to art. 45 of the EU Regulation, in order to meet contractual and/or legal obligations or requests, also directly and/or indirectly connected to the purposes described in more detail in point a) of art. 3.1. above of this disclosure.

5.2. When you have provided your optional consent to the purposes pursuant to point b) of art. 3.1. above of this disclosure, your personal data described in more detail in art. 1.1. above may be communicated and/or disclosed to third parties with registered office in the European Union or in countries outside the EU considered adequate pursuant to art. 45 of the EU Regulation for the purposes described in point b) of art. 3.1. above and according to the methods described therein.

6. Duration of storage of the personal data collected and processed.

6.1. In compliance with art. 13, paragraph 2 letter a) of the Regulation, the period of storage of your personal data will coincide with the duration of the contractual relationship between the undersigned Data Controller and you, and may be extended in order to carry out hypothetical processing subsequent to the termination of the contract or deriving from statutory/fiscal/tax obligations or the need to manage any out-of-court or judicial dispute lodged against or by the Data Controller.

6.2. Your personal data will be processed with the support of manual, computerised or electronic means.

7. Principles applied to the processing of your data.

7.1. In compliance with art. 5 of the Regulation, please note that your personal data will be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation');
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- Accurate and, where necessary, kept up to date ('accuracy');
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation');
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

8. Rights of the data subject.

8.1. In relation to your personal data processed by the Data Controller, we inform you that you are entitled to exercise the following rights, transcribed below in full:

Right of access by the data subject (art. 15 of the Regulation)

"1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: (a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; (f) the right to lodge a complaint with a supervisory authority; (g) where the personal data are not collected from the data subject, any available information as to their source; (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. 2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer. 3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. 4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others".

Right to rectification (art. 16 of the Regulation)

"The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement".

Right to erasure ('right to be forgotten') (art. 17 of the Regulation)

"1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing; (c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); (d) the personal data have been unlawfully processed; (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1). 2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data. 3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary: (a) for exercising the right of freedom of expression and information; (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; (c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3); (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or (e) for the establishment, exercise or defence of legal claims".

Right to restriction of processing (art. 18 of the Regulation)

"1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies: (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject. 2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. 3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted".

Right to data portability (art. 20 of the Regulation)

"1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where: (a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and (b) the processing is carried out by automated means. 2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. 3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. 4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others".

Right to object (art. 21 of the Regulation)

"1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. 2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. 3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes. 4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information. 5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications. 6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of

personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest”.

Right to lodge a complaint with a supervisory authority (art. 77 of the Regulation)

“1. Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation. 2. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78”.

Right to an effective judicial remedy against a supervisory authority (art. 78 of the Regulation)

“1. Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them. 2. Without prejudice to any other administrative or non-judicial remedy, each data subject shall have the right to an effective judicial remedy where the supervisory authority which is competent pursuant to Articles 55 and 56 does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged pursuant to Article 77. 3. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established. 4. Where proceedings are brought against a decision of a supervisory authority which was preceded by an opinion or a decision of the Board in the consistency mechanism, the supervisory authority shall forward that opinion or decision to the court”.

8.2. In compliance with art. 12(1) of the Regulation, CLEVERTECH S.p.A. undertakes to provide you with the communications pursuant to articles 15 to 22 of the Regulation in concise, transparent, intelligible and easily accessible form with simple and clear language; this information will be provided in writing or with other possibly electronic means or, at the request of the data subject, verbally, provided the identity of the data subject is proved with other means.

8.3. In compliance with art. 12, paragraph 3 of the Regulation, the Data Controller informs you that it undertakes to provide you with the information relating to the action undertaken with regard to a request pursuant to articles 15 to 22 without unjustified delay and, in any event, at the latest within one month of receipt of such request; this term may be extended by two months, if necessary, taking into account the complexity and number of the requests.

8.4. In order to be able to exercise the rights described in more detail above in this article, the Data Subject may make use of the contact information provided in art. 2. of this “Information”.

9. Processing procedures.

9.1. We inform you that your data described in more detail in art. 1.1. above of this disclosure will be processed with manual, electronic or computerised tools and/or media, with full respect for the law, according to the principles of lawfulness and fairness, and in a manner so as to protect their confidentiality.

Cadelbosco di Sopra (RE), dated 25.05.2018

CLEVERTECH S.p.A.

(represented by its pro tempore legal representative)

GIUSEPPE REGGIANI

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