

## Privacy Policy

In the following paragraphs, you will find the description of the administrative methods of the website [www.eraspares.com](http://www.eraspares.com) concerning the processing of personal data of those users who look up the present website and who use the web services relative to it.

The present informative report makes exclusively reference to the website [www.eraspares.com](http://www.eraspares.com) and it does not refer to any other website that can possibly be consulted by the users through the links.

All personal data of the subjects (natural and / or legal persons) who, in various capacities, access to the services offered by the sites, will be processed by Era S.p.A., Data Controller, according to the regulation in force, and in any case, to the necessary confidentiality.

The optional and voluntary sending of e-mail messages to the addresses indicated on the website, implies the capture of the sender's address as well as the capture of other personal data entered in the message in order to meet the requirements. The access to particular services or the answer to determinate request can be subordinated to the entering of personal data in the provided application forms (coupon); in this case, the capture of the required data is necessary for the execution of all operations in the sake of the subject.

The refusal to confer some data may imply the impossibility of administrating the service. In any case, on filling in the coupon, you will be able to consult the specific informative report related to the required service.

With regard to the indicated purposes, the processing of personal data is carried out through manual, computerized and telematic tools with logics strictly connected to the purposes themselves and, in any case, to guarantee the security and confidentiality of the data within the Code.

In their usual course of action, the computer systems and the software procedures, used for the administration of the website, acquire some personal data whose transmission is implicit in the use of the internet communication protocols.

The aforesaid pieces of information are not collected in order to be associated with identified data subject, but due to their own nature, they could permit to identify the users, through processing and association with data held by third parties.

IP addresses or the names on domain of the computers used by the users who connect to the website, URI (Uniform Resource Identifier) notation addresses of the required resources, the time of the request, the method used to submit the request to the server, the dimension of the file obtained in answer, the numerical code showing the status of the answer provided by the server (success, error, etc.) and other parameters related to the operating system and the computer environment of the user fall into this category of data. These data are exclusively used to obtain anonymous statistical information concerning the use of the website and to check their correct functioning. They are stored for the period of time established by the related regulations. The data might be used in order to verify the responsibility in case of hypothetical computer crimes to the detriment of the website.

Cookies (short files of text stored on a user's computer by their web browser in order to manage additional features, necessary for a complete fruition of the website and / or to track the entries into its different pages) will be used exclusively to monitor the effectiveness of the online presence of the website and to point out the pages visited with higher frequency; cookies will never be used to obtain personal data, such as names or e-mail addresses.

The pieces of information collected through cookies are aggregated anonymously. They have a statistical purpose. For instance, they verify the number of contacts of the website in a determinate period of time or the frequency of the entries of the visited pages or the track used in the visited pages.

If you do not want to receive cookies, we kindly ask you to set up your browser opportunely. You will find the directions necessary for this purpose in the documentation related to your browser.

Employees and / or collaborators of the Data Controller, as persons in charge of the processing, and the persons themselves in charge of the processing could be acquainted with your data; the data will not be disclosed or communicated to Third Person, unless it is provided for the informative report and / or the law and, in any case, using methods within it.

You will be able to apply to the Privacy Service, at the data controller, to verify your own data and to complete, update or to rectify them and / or to exercise the other rights under the Art. 7 of the Code.

The data controller is ERA S.p.A. with head office in Via Santi 15 - Reg. Sanda Vadò - 10024 Moncalieri (To). The complete and up to date list of the persons in charge is available on the website indicated.

## **Subject: Informative report under Article 13 D.Lgs 196/03 “Code of protection of personal data”**

To the Suppliers

### **Premise**

Further to the discipline dictated by the D. Lgs. 196/03 “Code of protection of personal data” (hereafter “Code”), we shall provide the information concerning the use, made by the company itself, of the personal data acquired with regard to the intervening contractual relations with your Company or to those contractual relations which could be established in the future.

### **Source of personal data**

The data in our possession, acquired in regard to the contractual relations, are directly collected at the data subject. All the collected data will be processed according to the regulation in force, and in any case, to the necessary confidentiality.

### **Purpose of the processing**

The collection, that is the processing of personal data, has the exclusive purpose of providing the execution related to the completion of the economic activity of our company in an appropriate way, and in particular for:

- the fulfilment of contractual obligations;
- the execution of specific requests by the data subject before the stipulation of the contract;
- the fulfilment and execution of the obligations provided for in laws, rules and community rules;
- the fulfilment of fiscal and accounting obligations;
- managerial, operational and reliability control requirements;
- management of the question of law.

### **Processing methods**

With regard to the indicated purposes, the processing of personal data is carried out through manual, computerized and telematic tools with logics strictly connected to the purposes and, in any case, to guarantee the security and confidentiality of the data within the cited Code.

### **Nature of the collection**

With the purpose of agreement and completion of the contractual relation, the collection of the personal data has also a mandatory nature, since the legal and fiscal execution must be carried out. The refusal to provide these data will imply the impossibility of establishing working relations with the company.

### **Communication and disclosure**

The personal data and their relative processing will be communicated to other companies in order to carry out economic activities (commercial, executive, management of the informative systems, insurance, bank intermediation or simply intermediation, factoring, management of the shipping, mail insertion and forwarding of correspondence) or to discharge the rule of law (chartered accountants and lawyers offices). The data will not be divulged. The following categories of subjects, in charge of the processing, could be acquainted with your data: President, Chief Executive Officer, Commercial Manager, Human Resources Office, Accounting Department, Warehouse Manager, IT Department, Operating and People in charge of the Warehouse, Sales Agents, Engineering Department.

### **Rights of the person concerned**

The data subject will be able to apply to the Privacy Service, at the data controller of the processing, to verify his own data and to complete, update or to rectify them and / or to exercise the other rights under the Art. 7 of the Code (in the attachment).

## Data controller

The data controller is ERA S.p.A. with head office in Via Santi 15 - Reg. Sanda Vadò – 10024 Moncalieri (To).

### **Art. 7 D.Lgs 196/03 (Right to access personal data and other rights)**

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their already being recorded, and the communication of such data in intelligible form.
  
2. The data subject has 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 in case the processing is carried out with the help of electronic means;
  - d) the identification data concerning the data controller, the executives and the representatives designed under the Article 5, paragraph 2.
  - e) the subjects or categories of subjects to whom the personal data may be communicated and who may be acquainted with them in their capacity as designated representative in the State's territory, executives or persons in charge of the processing.
  
3. The data subject has the right to obtain:
  - a) the updating, the rectification, or where interested therein, the integration of the data;
  - b) the erasure, anonymization or blocking of the data that have been processed unlawfully, including data whose retention is unnecessary for the purpose for which they have been collected or subsequently processed;
  - c) the certification that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom 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. The data subject has 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 material or direct selling or else for the performance of market or commercial communication surveys.

## **Privacy Policy Statement (art. 13 Legislative Decree No. 196/03 "Code on the Protection of Personal Data")**

With this privacy policy statement, ERA S.p.A., as Data Controller, provides certain information concerning use of personal data necessary to manage the contract and for fulfilment of legal obligations.

Your data will be processed using suitable manual, electronic and online procedures for the following purposes:

- to manage and fulfill pre-contractual obligations;
- to manage and fulfill obligations deriving from the contract;
- to furnish the main and/or accessory services envisaged by the contract;
- to fulfill and comply with legal obligations, obligations deriving from regulations and European Community rules;
- for management, operating and creditworthiness/solvency control requirements;
- for management of disputes;
- to permit access of your employees or co-workers to the premises of our company;
- for commercial and marketing purposes through use of e-mail coordinates to send promotional and advertising material concerning products or services similar to those regulated by the contract, pursuant to section 130, paragraph 4. With regard thereto, you may oppose such processing initially or at the time of subsequent communications.

The collection of certain personal data is compulsory in order to comply with legal and fiscal requirements. Therefore, if you refuse to provide this information, it will be impossible to establish relations with our company.

Your personal data will not be disclosed and may be communicated to:

- individuals to whom communication is necessary in order to comply with legal obligations, obligations deriving from regulations and European Community rules;
- contractors in the case of assignment of works, also partially, to external companies;
- subsidiary or associated companies within the meaning of art. 2359 Italian Civil Code for administrative-accounting purposes.

Your data may be disclosed to the Chief Executive Officer and the following categories of internal data processors: Warehouse personnel, Agents, Sales Staff, Accounting Department, Warehouse Operative, Sales Manager, Head of Management Control, Warehouse Manager, Head of Administration and Finance, Marketing and Engineering Office, Purchasing Office, IT Office.

You may contact the Privacy Service of the Data Controller to verify the existence of your data and have these integrated, updated, corrected and/or exercise all other rights established by section 7 of the Code. In particular, you may initially oppose the sending of commercial information pursuant to section 130, paragraph 4:

- sending an email to the address [era@eraspares.it](mailto:era@eraspares.it)
- connecting to the page of the [www.eraspares.it](http://www.eraspares.it) website

The Data Controller is Era S.p.A. with head office in Via Santi 15 - Reg. Sanda Vadò - 10024 Moncalieri (TO) (a complete, updated list of Data Processors can be found on the <http://www.eraspares.it> website).

**Art. 7 Legislative Decree No. 196/03 (Right to Access Personal Data and Other Rights)**

1. The data subject has the right to obtain confirmation as to whether or not his/her personal data exist, regardless of their being already recorded, and communication of such data in intelligible form.
  
2. The data subject has the right to be informed:
  - a) of the source of the personal data;
  - b) of the purposes and methods of the processing;
  - c) of the logics applied to the processing, if the latter is carried out with the help of electronic means;
  - d) of the identification data of the data controller, data processors and the representative designated as per Section 5(2);
  - e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may be informed of such data in their capacity as designated representative(s) in the territory of the State, data processor(s) or person(s) in charge of processing.
  
3. The data subject has the right to obtain:
  - a) updating, rectification or, where interested therein, integration of the data;
  - b) erasure, anonymization 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, also as regards 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 to be protected.
  
4. A data subject has the right to object, in whole or in part,
  - a) on legitimate grounds, to the processing of his/her personal data even though relevant to the purpose for which they have been collected;
  - b) to the processing of his/her personal data when is carried out for the purpose of sending advertising material or direct selling or for the performance of market or commercial communication surveys.

*(updated to 26/05/2014 )*

**Subject: Informative report under Article 13 D.Lgs. 196/03 "Code of protection of personal data" (hereafter "Code").**

ERA S.p.A. would like to inform you that, under Art. 13 of the Code, the personal data, provided by you to the company itself, spontaneously or in reply to announcements, are submitted to the processing required by the same law. We remind that with processing is meant any operation or complex of operations, carried out, whether or not, through the support of electronic or computerized means, concerning the collection, the registration, the consultation, the organization, the storage, the processing, the modification, the selection, the extraction, the comparison, the use, the interconnection, the block, the communication, the disclosure, the erasure and the destruction of the personal data of the data subject.

The purposes of the said processing, which will be carried out, whether or not, through computerized means, are pertaining to the evaluation of your eventual application in order to establish a working relation or collaboration with the company itself.

The conferment of these data is optional. The refusal to confer some data may imply an incorrect evaluation of the professional skills.

The data in question will not be subject to disclosure and they will be processed by our company for a period of six months. After this period the data will be destroyed. The following categories of subjects, in charge of the processing, could be acquainted with your data: Human Resource Office.

We would like to assure you that any communication will be carried out according to the rule, and, in particular, it will be strictly connected to the aforesaid purposes.

Eventual sensitive data indicated (concerning, in particular, health and religious and political creed) will be immediately cancelled unless our company is provided with a written declaration of consent of the data subject regarding the processing of those data.

He will be able to apply to the Privacy Service, at the data controller of the processing, in order to verify your own data and to complete, update or to rectify them and / or to exercise the other rights under the Art. 7 of the Code (in the attachment).

Please be informed that the data controller is ERA S.p.A. with head office in Via Santi 15 - Reg. Sanda Vadò - 10024 Moncalieri (To).

## **Art. 7 D.Lgs 196/03 (Right to access personal data and other rights)**

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their already being recorded, and the communication of such data in intelligible form.
  
2. The data subject has 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 in case the processing is carried out with the help of electronic means;
  - d) the identification data concerning the data controller, the executives and the representatives designed under the Article 5, paragraph 2.
  - e) the subjects or categories of subjects to whom the personal data may be communicated and who may be acquainted with them in their capacity as designated representative in the State's territory, executives or persons in charge of the processing.
  
3. The data subject has the right to obtain:
  - a) the updating, the rectification, or where interested therein, the integration of the data;
  - b) the erasure, anonymization or blocking of the data that have been processed unlawfully, including data whose retention is unnecessary for the purpose for which they have been collected or subsequently processed;
  - c) the certification that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom 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. The data subject has 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 material or direct selling or else for the performance of market or commercial communication surveys.