

## **PRIVACY POLICY**

### **Introduction**

This Privacy Policy ("Policy") applies to TESI SpA which control and make use of visitor information collected via the website <http://www.tesisquare.com>

If you as a Visitor choose to register or submit information to this Website, you agree to the use of such data in accordance with this Policy. Please note that this site contains links to other sites, including sites maintained by other member firms and affiliates of TESI SpA, which may not be governed by this Policy.

### **Data collection and usage**

Visitors can consult this website anonymously. We will only obtain personal data relating to you if you voluntarily send us an e-mail through the site, by which you consent to the processing of your personal data for purposes of providing the materials, information and/or quote requested by your email. In that case, we will use your personal data only for the purpose of responding to your questions or comments and not for data collection. Such information may consist of your name, job title, company address, email address and contact numbers. We do not ask for or collect sensitive information (e.g., data relating to race or ethnic origin, religious beliefs, criminal record, physical or mental health or sexual orientation) from visitors. We will ensure that our marketing activities comply with applicable law and implement procedures to obtain necessary consents before sending you email containing information about TESI SpA service offerings. You may at any time request that we discontinue sending you such materials.

### **Navigation Data**

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard operation; the transmission of such data is an inherent feature of Internet communication protocols. Such information is not collected in order to relate it to identified data subjects, however it might allow user identification per se after being processed and matched with data held by third parties. This data category includes IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating and information system environment. This data is only used to extract anonymous statistical information on website usage as well as to check its operation; such data is deleted immediately after being processed. The data might be used to establish liability in case computer crimes are committed against the website; except for this circumstance, any data on web contacts is currently retained for no longer than seven days.

### **Location of Data Processing Activities**

All data processing activities covered by this Policy is performed at the headquarters of TESI exclusively by technical staff in charge of said processing, or by persons tasked with such maintenance activities as may be necessary from time to time. No data resulting from web-based services shall be communicated or disseminated outside the company. The personal

data is processed using automated tools and maintained strictly for the time necessary to achieve the purposes for which the data itself has been collected or as otherwise required by law.

### **Disclosure to third parties**

We will not share your data with third parties for purposes other than those set forth in this Policy. Personal data collected via this website may be disclosed to law enforcement, regulatory or other government agencies or third parties where necessary or desirable to comply with legal or regulatory obligations or requests or for the purposes identified above.

### **Access to Data**

Visitors are entitled at any time to obtain confirmation of the existence of personal data concerning them and be informed of their contents and origin, verify their accuracy, or else request that such data be supplemented, updated or rectified (Section 7 of Legislative Decree no. 196/2003). Visitors may correct and/or update their personal data and/or request deletion or blocking of any data that is processed in breach of the law as well as object in all cases, on legitimate grounds, to its processing, or request that their data be rendered anonymous. TESI will treat requests to access personal data or change personal data in accordance with applicable legal requirements. All requests should be sent to the Data Controller, TESI SpA, as set forth in this Policy.

### **P3P**

This privacy notice can be viewed in automatic format by means of the most recent browsers implementing the P3P ("Platform for Privacy Preferences Project") standard as proposed by the World Wide Web Consortium ([www.w3.org](http://www.w3.org)). All efforts will be made to ensure the highest interoperability between the functions of this site and the automatic privacy verification mechanisms that are made available by some products applied by users.

### **Information security**

TESI SpA has adopted reasonable commercial standards of technology and operational security to protect all data provided by or collected from visitors to this website. However, TESI SpA cannot guarantee that the measures implemented for the security of the website and the transmission of data and information limit or exclude any risk of unauthorized access or loss of data, and expressly disclaims any liability, to the extent allowed by law, for any breach of security. Visitors are therefore advised to make sure that their computers are equipped with adequate safeguards for the protection of data transmission over the network, both incoming and outgoing (such as updated anti-virus systems) and that their Internet service providers have taken all appropriate measures to ensure security of data transmission over the network (such as firewalls and anti-spam filters).

### **Changes to our privacy policy**

TESI SpA reserves the right to modify or amend this Policy at any time and for any reason. Nothing contained in this Policy creates or is intended to create a contract or agreement between TESI SpA and any user visiting the Web site or providing personal data of any kind. The changes and updates will be notified to users on the website Home page as soon adopted and will be binding once posted on the website in this section. Therefore, users are invited to regularly access this section to verify the publication of the most recent and updated Privacy Policy.



### **Governing Law**

This Privacy Policy is governed by Italy's Legislative Decree no. 196/2003 (Personal Data Protection Code) which applies to the processing of personal data, including data held abroad, where the processing is performed by any entity established either in the State's territory or in a place that is under the State's sovereignty. This Policy is also based on the guidelines contained in Recommendation no. 2/2001, which was adopted on 17 May 2001 by the European data protection authorities within the Working Party set up under Article 29 of European Directive 95/46/EC in order to provide minimum requirements for the collection of personal data online, including information to be provided by data controllers to users visiting web pages for whatever purpose.

This Code shall also apply to the processing of personal data that is performed by an entity established in the territory of a country outside the European Union, where said entity makes use in connection with the processing of equipment, whether electronic or otherwise, situated in the State's territory, unless such equipment is used only for purposes of transit through the territory of the European Union (Section 5 of Legislative Decree no. 196 of 30.6.2003). TESI SpA guarantees that the personal data of the user will be processed with respect for the rights, fundamental liberties and dignity of the interested party, with particular reference to confidentiality, personal identity and the right to the protection of personal data.

### **Contact**

The Data Controller is TESI SpA, with registered office at Via Mendicità Istruita 24, 12042 – Bra(CN) Italy. If you have any questions regarding this Policy, please email us at [privacy@tesisquare.com](mailto:privacy@tesisquare.com).