

WHY ARE WE SENDING THIS NEWSLETTER?

This newsletter deals with the processing of the personal information of users consulting the web site.

This newsletter is provided under Article 13 of Italian Act 196/03 and is addressed to all those using the *web* services of Sirnet S.r.l. (<http://www.sirnet.it>).

The newsletter applies to www.Fincibec.it or www.Fincibec.com web sites.

THE “DATA CONTROLLER”

As a result of the consultation of the web site, information concerning identified or identifiable persons may be handled.

The “data controller” is Fincibec .S.p.A. the operating facilities of which are based in Via Valle d’Aosta, 47 41049 Sassuolo (Modena) Italy.

PLACE IN WHICH DATA IS HANDLED

Handling connected with the *web* services of this site takes place in the registered office of Sirnet S.r.l. and is entrusted only to technical personnel of the office appointed to handle data or by persons performing occasional maintenance.

None of the information gathered from web services is shared or disclosed.

Personal information of users that have asked for informative materials are used only for the purpose of offering and giving the performance requested and will be disclosed to third parties for this purpose only.

TYPE OF DATA HANDLED

Surfing information

During normal operation, computer systems and software procedures needed for this web site lead to the acquisition of personal information, the transmission of which is part of the use of the Internet’s communication protocols.

This information has not been collected for association with identified interests. However, owing to its own nature and by means of elaboration and association with data held by third parties, this information may enable users to be identified.

This category includes IP addresses or computer domain names employed by users that connect with the site, *URI (Uniform Resource Identifier)* notation addresses of the resources requested, the time at which the request was made, the method used to submit requests to the server, the size of the file obtained, the numeric code indicating the status of the response given by the *server* (successful, error, etc.) and other parameters relating to the operating system and environment of the user.

This data is used only for gathering anonymous statistical information concerning the use of the site and to control correct operation. This information is deleted immediately after elaboration. The information may also be used to assess responsibilities in the event of computer offences involving the site.

Data voluntarily provided by the user

The optional, explicit and voluntary transmission by e-mail to the addresses provided by the site results in the subsequent acquiring of the sender’s address, which is necessary for replying to enquiries, and of the personal information given in the e-mail message.

Specific newsletters will be provided or displayed in the site’s pages for services on demand.

COOKIES

No personal data of the user is deliberately acquired by the site.

No *cookies* are used to transmit personal information. Furthermore no persistent c.d cookies of any kind are used, namely systems for tracking users.

The use of c.d. *cookies* relating to a particular session (that are not permanently stored on the user’s computer and that disappear when the browser is closed) is strictly restricted to the transmission of the session’s identification data (numbers provided at random by the *server*), which are needed to safely and effectively explore the site.

C.d. *cookies* relating to sessions, adopted in this site, avoid the use of other computer techniques which may compromise the confidentiality of the user and do not enable personal identification data of the user to be acquired.

VOLUNTARY NATURE OF PROVIDING THE REQUESTED DATA

Apart from the above-mentioned surfing data, users are free to provide personal data in the application forms. Failure to provide this data may render the application impossible.

DATA HANDLING METHOD

Personal data are handled with automated tools for the time strictly necessary to achieve the results for which data has been gathered.

Special safety measures are adopted for preventing the loss of data, unlawful or improper use and unauthorised access.

DATA SUBJECT’S RIGHTS

A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, to be informed of the contents and source, to assess its exactness, or ask for its integration, updating or rectification under art. 7 Act 196/03

Under the same article, the data subject has the right to obtain erasure, anonymization or blocking of data that have been processed unlawfully, as well as to object on legitimate grounds, to the processing of personal data concerning him/her.