

On 1 January 2004 legislative decree No. 196 of 30 June 2003 entered into force – Data Protection Code (hereafter the “Code”) - which replaced law No. 675 of 31 December 1996 and many statutory and regulatory provisions.

The Code guarantees that the processing of personal information shall occur in a manner that respects fundamental rights and freedoms, as well as the dignity of the interested party, with particular reference to confidentiality, personal identity and right to protection of personal information.

Pursuant to Article 13 of the law, we hereby inform you that your personal information, comprised of your details, commercial information and other information necessary for the preliminary treatment, collected both prior to and after the conclusion of the credit assignment agreement with the assignor, (together, the “personal information”), shall be processed pursuant to Article 4(1)(a) (the “Processing”) of the Code, under the terms of the legislation cited above and in accordance with the obligations of confidentiality that guide our company’s operations. We wish in particular to inform you of the following:

Purposes and conditions of treatment.

The collection and processing of the information relating to the interested party shall be performed in order to enable this Company to carry out the following activities:

- Compliance with statutory, fiscal or accounting requirements;
- Client management;
- Financial services;
- Internal control services;
- Litigation management, where applicable;
- Statistical analysis (other than marketing).

The persons responsible for the services may explain, on request, which specific categories of information are processed for the individual purposes specified above.

The processing of the information for these purposes shall occur both electronically and manually, according to logical criteria that are compatible with and useful for the purposes for which the information is collected, in accordance with the rules governing confidentiality and security provided for by law and our internal regulations. In particular, the information shall be processed through comparison, classification and calculation, as well as the production of lists.

Some information will also be processed on behalf of the company by third party companies, bodies or professionals which, in their capacity as Data Controllers, carry out specific processing services or complementary activities to our own, such as IT service companies, companies which provide payment services, outsourcing companies, consultants and self-employed professionals, all in accordance with statutory provisions on data security.

Where required under statutory or regulatory obligations, the information will be transmitted to oversight bodies or organs (for example, the Bank of Italy for the management of the Italian Central Credit Register [*Centrale Rischio*], to the SIA-SSB for the management of the central register for credits of a low amount, and to the Italian Foreign Exchange Office in compliance with the obligations imposed by anti money laundering legislation). In accordance with the regulations of the Antitrust Authority (measure of 10/9/09), in the event that certain operations which concern the interested party are considered to be suspicious pursuant to Article 41(1) of legislative decree No. 231 of 21 November 2007, the relative information – including the personal information – shall be communicated to other financial intermediaries from the UBI Banca Group, to which UBI Factor belongs.

The information relating to the interested party has been provided to the Company by the assignor in accordance with the principles of the relevance of the information and of moderate disclosure; some information has been collected from public registers or from other subjects, such as companies specialising in the collection and elaboration of public information or that relating to the conduct of economic activities.

Compulsory of optional nature of the data communication.

The processing is carried out under the terms of and in accordance with the law (namely if required by law, regulation, measure of a public authority, etc.) applicable to the factoring agreement. The processing of the information does not require the consent of the interested party.

The information will not be distributed in any manner.

The information will not be transferred abroad in any manner.

The rights of the interested party.

Article 7 of the Code grants the interested party numerous rights which we invite you to consider carefully. Amongst these, we remind you of the rights to:

1. obtain confirmation as to whether or not personal information exists that concerns you, even if it has not yet been registered, and to be notified of it in intelligible form;
2. obtain an indication:
 - a) of the origin of the personal information,
 - b) of the purposes of and procedure for processing,
 - c) of the logic applied for processing carried out with the assistance of electronic instruments,
 - d) of the details of the Data Controller, the Managers and the designated representative,
 - e) of the individuals and categories of individual to whom the personal information may be communicated or who may become aware of it in their capacity as a designated representative within the territory of the State, or as managers or persons responsible for the service;
3. obtain:
 - a) the updating, rectification or, where applicable, the supplementation of information,
 - b) the cancellation, transformation into anonymous form or block on information processed in breach of the law, including that which it is not necessary to store in relation to purposes for which the information was collected or subsequently processed,
 - c) the attestation that the operations specified under letters a) and b) have been notified, including as regards their contents, to those to whom the information was disclosed or distributed, other than in cases in which compliance proves to be impossible or entails the use of means that are manifestly disproportionate compared to the right protected;
4. oppose:
 - a) on legitimate grounds the processing of personal information which concerns you, even if it is pertinent to the purposes for which it was collected,
 - b) the processing of personal information which concerns you for the purposes of the dispatch of promotional or direct sales material or for the conduct of market research or business communications.

You may exercise these rights or request the list of designated managers by writing to UBI Factor S.p.A., Privacy Manager:

- Milan Headquarters, Via Fratelli Gabba, 1 - 20121 Milan (MI);
- Pordenone Business Unit, Via Giardini Cattaneo, 4 - 33170 Pordenone (PN).

Information relating to the Data Controller and the Manager

The data controller is UBI Factor S.p.A. with registered offices in Via Fratelli Gabba, 1, 20121 Milan; the managers responsible for the processing are:

- for the Milan Headquarters, the manager *pro tempore* of Legal and Company Affairs, with address for this purpose with the registered office of the Company;
- for the Pordenone Business Unit, the manager *pro tempore* of the business unit, whose address for this purpose is that of the business unit.

UBI Factor S.p.A.

Addressee Assigned Debtor