

Articles 13 - 14 of EU Regulation 679/2016

**ADVISORY NOTE ON THE PROTECTION OF PERSONAL DATA FOR
CUSTOMERS - SUPPLIERS - THIRD PARTIES
OF RAXYLINE S.r.l.**

Updated December 2018

This advisory note may be subject to change following the introduction of new regulations or following new processing which Raxy Line srl may implement. We kindly ask you, therefore, to periodically visit our website www.raxyline.com section "Advisory note for Customers-Suppliers-Third Parties" for updates.

For any clarification, further information, or to exercise the rights listed in this advisory note, please email info@raxyline.com or send a registered letter with return receipt to - Raxy Line srl, Via A. Volta, 5 31027 Spresiano (Treviso), Italy

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Tax Code/VAT No 03842520268 – Administrative Economic Register (R.E.A.) 30384

Companies Register TV no. 03842520268 Export TV 050526

Share Capital € 90,000.00 (of which paid-up 77,400.00)

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1. GENERAL INFORMATION ON PRIVACY.

With this advisory note, Raxy Line srl with registered offices in Via A. Volta, 5, 31027 Spresiano (Treviso), Italy, Tax Code/VAT No. 03842520268 - Administrative Economic Register (R.E.A.) 303084 Companies Register TV no. 03842520268 in the person of the legal representative pro-tempore, being the Controller in terms of processing personal data, wishes to advise you of the processing of your personal data in implementation of EU Regulation 2016/679 which establishes the rules for protecting and safeguarding natural persons with regards to the processing of their personal data.

This advisory note governs the processing of personal data for the purposes explained in clause 4 and following. For all the processing carried out through our website www.raxyline.com, see the link "Website Privacy Policy" published on the site itself.

Processing personal data is based on the principles of correctness, lawfulness, transparency and protecting the confidentiality of Customers as well as safeguarding all their rights. Raxy Line srl undertakes to comply with these aforementioned principles and, to that end, hereby informs you that - with the exception of that processing for which the law provides for your explicit consent - by providing your personal data, you accept and agree to be bound by the terms and conditions described in this advisory note.

EU Regulation 679/2016 provides for enhanced protection towards minors under the age of sixteen: processing their data can only be done by us if prior consent has already been provided or if authorised by someone with parental responsibility.

In any case, Raxy Line srl wishes to give you some information on the concept of processing personal data, on the people who manage it, on the main processing activities that our company has implemented, as well as on your rights as a data subject.

2. DEFINITION OF PERSONAL DATA AND THE PROCESSING OF THE SAME.

Personal data means all that information which identifies a certain natural person, or which makes a certain natural person identifiable. This includes information which directly allows for the identification of a subject (such as the first name, last name or tax code) or only indirectly (such as the online identifying number or profiling cookies in the event these are used in the website).

Processing personal data, however, means any operation or set of operations, whether done with or without automated processes, applied to personal data or sets of personal data, including collecting, recording, organising, structuring, storing, adapting or modifying, extracting, reviewing, using, communicating by transmission, divulging or any other form a making available, comparing or interconnecting, restricting, erasing or destroying.

3. IDENTIFYING THE CONTROLLER, THE PROCESSOR AND SUBJECTS IN CHARGE OF THE PROCESSING.

3.1 The Controller in terms of processing personal data.

The **Controller** is the natural or legal person, the public authority, the service or other body that, singularly or jointly with others, determines the purposes for which and the methods by which personal data is processed. It is, therefore, the same body that is responsible for security profiles. Relative to the processing of your personal data, the Controller is **Raxy Line srl**, in the person of the legal representative pro-tempore, better specified above. For any clarification or to exercise your rights, you may contact the Controller at one of the addresses mentioned above.

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3.2 The Processor in terms of processing personal data.

The **Processor** is, on the other hand, the natural or legal person, the public authority, the service or other body that processes your personal data on behalf of the Controller. Relative to the processing of your personal data, the Controller has appointed the following as external Processors:

- its accounting firm which will only process that data necessary to fulfil obligations of a tax and accounting nature to which the Control is subject by law.
- the company that supports and maintains our information systems and which, as it performs its activities, may process some of your personal data.
- the company responsible for maintaining and supporting our management systems and which, as it performs its activities, may process some of your personal data.

For any further information regarding the type of data that is processed, the methods of processing employed, the names of the companies performing any processing, please contact the Controller at one of the addresses mentioned above. The appointment of these parties - in terms of the extent of their responsibility - is limited to the already mentioned areas of processing.

3.3 The subjects in charge of the processing.

As regarding the **subjects in charge of the processing**, or the natural persons who process your personal data within the company, Raxy Line srl has formally appointed its own employees as subjects in charge of the processing. Each person has been trained and duly informed - in relation to the type of activity carried out within the company - on processing your personal data with care.

For more information about this, or any other subject, please contact the Controller at one of the addresses mentioned above.

4. PURPOSES FOR WHICH PERSONAL DATA IS PROCESSED AND OTHER RELEVANT INFORMATION.

4.1 Processing carried out for pre-contractual and contractual purposes regarding Customers.

Data that we could process. About the customer: first name and last name, residence, tax code, VAT no., company name, registered office address and address of operational facilities, email address, telephone number, bank details, any of the Customer's employees' first names and last names (if the Customer is a legal person), or the first name and last name of the Customer's relatives (if the Customer is a natural person).

Legal basis for processing personal data. Execution of pre-contractual measures adopted at the request of the data subject (such as a request for a quotation), execution of a contract (for example, a purchase contract), or legal obligations (tax or other obligations), a request for financing from third-party institutions.

Mandatory nature, or otherwise, of providing data. The Customer is not obliged to provide the data. However, not providing this data may make it impossible for Raxy Line srl to present an estimate, or to carry out an activity subject to a contract or to put the user in contact with a financial institute.

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Communicating data. In order to fulfil contractual or legal obligations, some of the aforementioned data may be sent to banking institutes, financial institutes, insurance companies or public bodies, or shipping companies to deliver goods. To defend its rights, Raxy Line srl may also communicate such data to lawyers. In any case, data is communicated to company employees who have been formally trained on data protection, or to parties specifically appointed as external Processors.

Particularly, in certain cases, when the customer needs to access financing services provided by third parties in order to purchase 2Bit products or services. In this case, processed data will be transferred internally to the financial institute for approval of the financing.

Transferring personal data to non-EU countries: no personal data will be transferred to a non-EU country. Our servers are situated in Italy.

Methods of processing personal data: with information systems (for example, through the use of computers or management systems) and on paper (with documents being printed).

Data storage period. In the event that a quotation is not accepted, the data you provided in order to prepare an offer will be erased immediately. However, in the event that a contract is stipulated, data will be stored for 10 years from the termination of the contractual relationship for legal, tax and accounting purposes to which our company is held by law.

Closure clause. The Customer - together with having reviewed this advisory note - declares to provide the same - without delay - to his/her employees or relations who their provide data to our company.

4.1.1 Processing carried out for

4.2 Processing carried out for pre-contractual and contractual purposes regarding service providers.

Data that we could process. About the Service Provider: first name, last name, VAT number, registered office address and address of operational facilities, bank details, email address, telephone number, any of the Provider's employees' first names and last names (if the Service Provider is a legal person), and so on.

Legal basis for processing personal data. Execution of pre-contractual measures adopted at the request of the data subject (request by Raxy Line srl to the Service Provider for a quotation), execution of a contract (stipulation of a purchasing contract) or legal obligations (of a tax or other nature).

Mandatory nature, or otherwise, of providing data. The Service Provider is not obliged to provide the aforementioned data. However, not providing this data may make it impossible for Raxy Line srl to assess the opportunity to stipulate a service contract or to proceed with stipulating a contract.

Communicating data. In order to fulfil contractual or legal obligations, some of the aforementioned data may be sent to banking institutes, insurance companies or public bodies. To defend its rights, our company may also communicate such data to lawyers. In any case, data is communicated to company employees who have been formally trained on data protection, or to parties specifically appointed as external Processors.

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Transferring personal data to non-EU countries: no personal data will be transferred to a non-EU country. Our servers are situated in Italy.

Methods of processing personal data: with information systems (for example, through the use of computers or management systems) and on paper (with documents being printed).

Data storage period. In the event that a quotation is not accepted by Raxy Line Srl, the data provided in order to present an offer will be erased immediately. However, in the event that a contract is stipulated, data will be stored for ten years from the termination of the contractual relationship for legal, tax and accounting purposes to which our company is held by law.

Closure clause. The Customer - together with having reviewed this advisory note - declares to provide the same - without delay - to his/her employees or relations who their provide data to our company.

4.3 Processing carried out for courtesy reasons regarding the Customer or the Supplier.

Data that we could process. About the Customer or the Supplier: first name, last name, email address, telephone number, company name, registered office address (of these, only those necessary).

Legal basis for processing personal data. The Controller's legitimate interests.

Mandatory nature, or otherwise, of providing data. Neither the Customer nor the Supplier is obliged to provide the aforementioned data. However, not providing this data may make it impossible for the Controller to supply the courtesy services to loyal Customers and Suppliers. The term "courtesy services" means sending greetings cards for upcoming dates, or invitations to special events and so on. The Controller believes that the special relationship established with each Customer and Supplier merits the existence of a legitimate interest in sending messages that fall within the aforementioned courtesy services. This does not affect the data subject's rights or freedoms.

Communicating data. This data will not be communicated to a third party. In effect, the aforementioned data will be processed solely by employees of Raxy Line srl specifically appointed for this type of processing.

Transferring personal data to non-EU countries: no personal data will be transferred to a non-EU country. Our servers are situated in the EU.

Methods of processing personal data: with information systems (for example, through the use of computers) and on paper (with documents being printed).

Data storage period. The storage period depends on the wishes of the Customer or the Supplier who may object to the processing of his/her personal data, at any moment, by contacting the Controller at one of the addresses mentioned above.

4.4 Processing carried out to screen third-party CVs.

Data that we could process. First name, last name, email address, telephone number, educational history, tax code and other data. The data subject is advised not to provide any data of a "sensitive or judicial nature" (articles 9-10 of

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EU Regulation 679/2016, such as, for example, health data, political alignment, any convictions and so on), unless this is strictly necessary.

Legal bases and purposes for which personal data is processed. Processing is lawful in as much as it is carried out to execute pre-contractual measures adopted at the request of the data subject. In effect, sending a CV - and the subsequent screening by the Controller of the professional details - aims to determine whether or not to establish a work relationship. In any way, the consent at the bottom of the CV must be issued in the event in which the data subject should decide to provide the Controller with data of a “sensitive or judicial nature”.

(“I hereby give my express consent to the processing of the “sensitive and judicial” data that I have provided in this CV”, with the date and your signature).

Mandatory nature, or otherwise, of providing data. Providing this data is not mandatory but not providing it, or providing only some of the aforementioned data, may make it impossible for the Controller to screen the proposal coming from the candidate.

Communicating data to third-party subjects. If a CV is sent spontaneously by the data subject, his/her personal data will not be communicated to a third party.

However, if a CV was sent by the data subject following a meeting or in response to an opening published by the Controller on a third-party website or through an employment agency, then these third-party companies may process the candidate’s data. If necessary, these third-party subjects will be appointed to process, and will be trained in processing, the candidate’s personal data with care.

Transferring personal data to non-EU countries. Our company has autonomous servers situated in the EU and so a data subject’s data will not be transferred to a non-EU country. As regards the Controller’s electronic mail and certified electronic mail services, the Controller relies on companies that have located their servers within Europe. The suppliers of these services have guaranteed adequate levels of protection with respect to European standards. In any case, if, in order to carry out a service in favour of the data subject, Raxy Line srl relies on a company based in a non-EU country (or has servers situated outside the EU), this should not concern the data subject since, if, in effect, the transfer of data should happen, this can only be done with the assurances required by law, that is, on the basis of an adequacy decision adopted by the European Commission, or with the safeguards required by the new European Regulation (such as the presence of binding rules for the company), or - in the absence of the aforementioned conditions - with the data subject’s consent, or as part of a contract between the data subject and the Controller, or as part of a contract between the Controller and a third party to carry out a service in favour of the same data subject.

If there are any doubts, or if you require more information regarding transferring data to a non-EU country, please contact the Controller at one of the addresses mentioned above.

Methods of processing personal data. Processing is carried out with information systems (email, use of personal computers and other management systems) and on paper (with CVs being printed).

Data storage period. The storage period depends on whether or not a work relationship is established. Indeed, in the event that there is no interest in the profile, the Controller will proceed to immediately erase the candidate’s data. On the other hand, if there is interest in the profile, but not necessarily at the present moment, Raxy Line srl will store the data for a maximum period of 15 months. Finally, in the event that a work contract is stipulated with the candidate, the Controller will

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store the new employee's data in accordance with that established in the "Information for employees" document which will be provided.

4.5 Processing in order to send a Newsletter for Customers-Suppliers and Third Parties.

Data that we could process. First name, last name, email address, telephone number (of these, only the data strictly necessary).

Legal basis for processing personal data. In relation to the specific processing (sending a Newsletter and/or an SMS): the data subject's consent or the Controller's legitimate interests. In the latter case especially, there are certain Customers or Suppliers who - by virtue of the existing or any previous contractual relationship with our company - expect Raxy Line srl to send messages that correspond with certain, already expressed, tastes or interests. There is also legitimate interest with regards to those who - having long been registered on our mailing list by email or telephone number - have shown their appreciation of our messages and news. This does not affect the data subject's rights or freedoms.

In addition, 2Bit srl partners with agencies who manage its promotional advertising. It is therefore possible that some data relative to potential customers is supplied to Raxy Line srl by these companies as part of that set up by the relative promotional contracts. Use of this data will be done in accordance with that established by this article and in compliance with the legal obligations, in accordance with the consent granted by the customer when giving his/her consent to the processing of his/her personal data to the initial Controller.

Mandatory nature, or otherwise, of providing data. Providing this data to the initial Controller is not mandatory but not providing it may make it impossible for the initial Controller to transfer your personal data to Raxy Line srl and, consequently, it will not be possible to send you a Newsletter to inform you of interesting news regarding updates on management solutions for your business. These messages - by their nature generic and not customised - will be sent to you via email or SMS or MMS or fax or the postal service.

Communicating data. The data used for this processing will be communicated to our company's employees and its external Processors who are authorised for this purpose and duly trained in how to carry out this type of processing. In some cases, in order to carry out a service in your favour, your personal data may be communicated to a third-party company appointed by us to manage the email marketing service (see the following point in this regard).

Transferring personal data to non-EU countries: when Raxy Line srl relies on third-party companies to provide you with the Newsletter service, some data could be transferred to a non-EU country. This happens since the companies upon which we rely - or their servers - may be based in non-EU countries. This should not concern you however since, if, in effect, the transfer of data should happen, this can only be done on the basis of an adequacy decision by the European Commission, or with the appropriate safeguards required by the new European Regulation (such as the presence of binding rules for the company), or, in the absence of the aforementioned conditions, with the data subject's consent, or as part of a contract between the data subject and the Controller, or as part of a contract between the Controller and a third party to carry out a service in favour of the same data subject.

If there are any doubts, or if you require more information regarding transferring your personal data to a non-EU country, please contact the Controller at one of the addresses mentioned above.

Methods of processing personal data: with information systems and, only rarely, with paper systems.

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Data storage period. The storage period for data used to send Newsletters depends on the wishes of the Customer-Supplier-Third Party who, at any moment, may revoke any consent previously granted. If processing is based on the Controller's legitimate interests, the Customer or Supplier affected may object to their personal data being processed at any time.

4.6 Processing carried out by the website regarding users

(Contact form – Newsletters – Cookies)

Raxy Line srl has provided the website www.raxyline.com through which the Controller collects data from data subjects. For more information regarding the processing carried out through the website, see the link "Information about the website" found at the bottom of the site itself.

4.7 Processing carried out with video surveillance systems.

Foreword. This information integrates the notice already affixed on the outside of Raxy Line srl's offices where video surveillance systems have been installed.

Data that we could process. The video surveillance systems used by Raxy Line srl exclusively on the outside of its registered offices, may record images of people who enter the offices.

Legal basis for processing personal data. Raxy Line srl believes that its legitimate interests form the basis of the legitimacy of the video surveillance, consisting of the protection of corporate assets and the safety of all those who work in the offices.

Mandatory nature, or otherwise, of providing data. It is not mandatory to provide data but not being able to acquire it will make it impossible to access the offices of Raxy Line.

Communicating data. In order to fulfil contractual or legal obligations, some of the aforementioned data may be sent to the police forces. To defend its rights, Raxy Line srl may also communicate such data to lawyers. In any case, data provided will be communicated to the company's employees who manage the video surveillance service.

Data storage period. The installed video surveillance system is a closed circuit one and only views images without recording them, hence no data is stored. The video surveillance system complies with the EU Regulation's principles and thus protects and safeguards the rights and freedoms of customers, suppliers and third parties.

4.8 Closure clause on processing in general.

Raxy Line srl only processes that data strictly necessary to fulfil the various purposes for which the data is collected. The data that you provide to us will not be divulged in any way whatsoever, nor transferred to an international organisation. All processing is carried out at our company's registered offices or at the offices of the aforementioned Processors. No automated processing, such as profiling, on which decisions are based that have a legal effect or that have a similar impact within the scope of natural persons, is carried out by Raxy Line srl. Except for that processing, which is carried out for contractual or legal purposes, your personal data will not be processed without your prior consent. In some cases, and only when processing is carried out to the benefit of the data subject since he/she has a legitimate expectation of it - the legal basis for processing personal data will reside in the legitimate interests of our company. Your personal data will not be communicated to a third party unless this is required by a contractual or a legal obligation. Our company undertakes not to transfer personal data to a non-EU country: in any case, if this should happen, transferring data will be done with all the assurances required by law (adequacy decision, binding rules for the company, contract, etc.). The data storage period - except when the data subject revokes his/her consent or objects to the processing of his/her personal data - will correspond to the execution period for the service.

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5. THE RIGHTS OF CUSTOMERS, SUPPLIERS AND THIRD PARTIES.

The data subject - or whoever makes his/her personal data available to the Controller - has the following rights:

- the data subject has the right to ask the Controller for access to his/her personal data, that is, to know which data the Controller is processing.
- the data subject has the right to have his/her personal data updated.
- the data subject has the right to have his/her personal data rectified, that is, to have this data modified if it has changed.
- the data subject has the right to have his/her personal data integrated, that is, to integrate this data with other information supplied by the data subject.
- the data subject has the right to restrict the processing of his/her personal data, that is, to restrict the Controller's use of this data.
- the data subject has the right to object to the processing of his/her personal data, for legitimate reasons.
- the data subject has the right to have his/her personal data made portable, that is the right to receive all his/her personal data in a structured, legible format on a machine-readable device.
- the data subject has the right to ask the Controller to erase his/her personal data.
- the data subject has the right to request that his/her personal data be transformed into anonymous form, or to block that data which has been processed in breach of the law, including that data for which storage is not necessary in relation to the purpose(s) for which this data was collected or subsequently processed.
- the data subject has the right to obtain confirmation from the Controller that the operations regarding updating, rectifying, integrating, erasing, blocking and transforming data, have been brought to the attention, including by way of their content, of whomever the data has been communicated or divulged, except in the case in which this is rendered impossible or involves an effort manifestly disproportionate to the protected right;
- the data subject has the right to revoke any consent granted, at any time, without prejudice to the lawfulness of any processing carried out up to that moment.
- the data subject has the right to lodge a complaint with a Supervisory Authority which, in Italy, is the Italian Data Protection Authority (Garante per la Protezione dei dati personali) in the event that the law has been, or is suspected of having been, breached.

For a more in-depth examination of your rights, we refer you to articles 15 – 16 – 17 – 18 – 20 – 21 of EU Regulation 679/2016. Requests may be directed to the Controller, without formalities, at one of the addresses given above.

6. Security measures

The Controller undertakes to protect your personal data by adopting all the computerised and physical security measures necessary. No security system can, however, guarantee with absolute certainty such protection. Therefore, without prejudice to those cases in which the Controller is at fault, Raxy Line srl will not be held liable for any deed carried out by a third party who unlawfully accesses a system or workplace without the necessary authorisation. For any further information regarding the security measures, please contact the Controller at one of the addresses mentioned above.

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