



INFORMATION ON THE PROCESSING OF PERSONAL DATA

(pursuant to Article 13 and 14 paraf. 5 let. b-d European regulation GDPR 679/2016)

Dear Sir, Dear Company " Data Interested Party "

we wish to inform you that, according to the ABILITIES and REQUIREMENTS, the Company is in possession of **Government Authorization valid on the entire National Territory**, in the areas of "Collection of Company Information and Investigations- Insurance / Banking, to assess COUNTERPARTY RISKS in the pre contractual and / or in phase, to defend a right in judicial in civil and criminal degrees (pursuant to Article 134 of the Consolidated Law on Public Security Law and subsequent Ministerial Decree 269/2010), in addition to consulting activities computer science, organizational, training and management with particular reference to Sic and mathematical models of attention and warning indicators, our company collects some personal data from public registers, lists, public archives or contained in public documents or documents (kept, for eg, from Chambers of Commerce or from the Territorial Agency and from the Public Administration, etc.) or otherwise generally access hissed by anyone (as derived, for example, from categorical lists, press reports and websites that can be consulted by anyone / part of international organizations, ministries, etc.) and well-known.

Our Company can acquire information regarding organizational, compliance, production, industrial, commercial, economic, financial, equity, administrative and accounting aspects related to the activity carried out by economic operators, and data referring to natural persons connected to companies or counterparts (such as, but not limited to, chambers of commerce, prejudicial to conservatism, hypocatastal data, financial statements, protests and insolvency proceedings, tenders, CIGS, public funding, anti-money laundering Black List, penalties, disciplinary proceedings, violations of laws-laws- , art. press etc.).

These data are processed by our company, as "independent owners" or "responsible of the client", to provide the third parties who request them (our client who is "a party with the interested party") information services that are used to evaluate the activities, the solidity and economic and commercial capacity of a person or company and to carry out checks in the context of any commercial relationships in progress or to be established (which, in the absence of correct and complete information, may be precluded due to lack of transparency between the parties, bearing in mind the lawfulness and correctness of the treatment and Balancing of the Rights of the parties, in the principle of the fundamental rights and freedoms of natural persons and in particular the right to the protection of personal data.

In particular, the information is collected also through IT tools and possibly registered in our electronic archives, (only if they are public or well-known data, and according to procedures of **conservation** and use over time, as per regulations / codes of conduct and in any case sworn at the same time that it will never exceed **5 - 10 years**, or according to the principle of the fact-event prescription) following specific computerized checks to ensure their consistency, completeness and accuracy, and are periodically updated if necessary, directly with links to Institutional Sources. Our archives are organized and managed with the computerized procedures necessary for communication, also by telematic means, to our customers; The documents show the data extracted from public sources and / or the analysis, comparison and processing of such data for the preparation of reports / technical risk files or economic and commercial information dossiers to be provided to customers who request them, through ad Hoc Warrant or annual agreements, and with specific letters of assignment.

In preparing such reports and dossiers, the personal data acquired by our Company may also be the subject of further analysis or statistical processing, even in an automated form, in order to give a summary judgment or a score on the degree of reliability, solvency or ability on the economic and commercial plan of the company or person involved (so-called scoring) and / or the probability of default / default of a company (so-called rating), taking into account, for example, its overall economic, financial and financial situation, as well as previous years and current receivables and payables, any payment delays, also with reference to subjects with responsibility or important corporate positions / Top management or from inconsistencies deriving from the comparison of events and procedures. These procedures of evaluative judgments, however, are always under control and with the active presence in the process by analysts who can rectify it the value of the automated expression.

Where requested by our customers, personal data may be enriched by searching, by post, fax or telephone, at the main interested party or third parties, private sources (other companies and economic operators) of information and investigations and / or credit management, further and relating also to CDs payment habits of a company or professional in commercial relations with its customers, suppliers or partners (References). However, these subjects provide their own information to the interested parties, in which the communication of the data to information companies, such as ours, is also indicated, for the purpose of verifying their reliability or solvency and punctuality of the agreed payments.

I.C.A. Finance S.r.l.

Aut.Gov. Tulps Pref.NA 2012-Albo UIF n.133447 del 09/04/2010 Banca D'Italia
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The aforementioned information, exclusively of an accounting / accounting nature, is processed in aggregate form within our systems and the information reports prepared for our customers. The acquisition of both sensitive data and information covered by company and industrial secrecy is excluded.

All personal data collected and processed by our Company are stored and protected by appropriate measures of confidentiality and security, even in the case of use of electronic communications systems and networks, and can only be known internally by employees and collaborators / External suppliers, managers or persons in charge of collecting, analyzing, processing and communicating the same data or preparing information reports, as well as technical assistance and maintenance of our information systems.

Personal data are not subject to dissemination, and are not subject to monitoring and specific systemic profiles, nor are the treatments carried out on a large scale or on particular categories of Data or people.

Except for rare cases, and occasionally, for certain mandates of investigations for the defense of a right in court and observing the balance of rights between the parties, profiling methods could be applied, according to mathematical models in scientific use and where the Purpose of investigation is relevant, legitimate and well-founded, and also possibly dealing with both sensitive and judicial data, relevant and strictly necessary and pertaining to the case in question.

In this case, the Data will not be recorded and stored, except for the time necessary for the completion of the professional assignment, generally between **30 and 120 days**. processing, in addition to cases where the extension of the timing may be required, with a further renewal mandate, by the client, the times could last even **within six months**.

In this case, there will be more stringent logical and physical security measures appropriate to the risk of processing sensitive and judicial data, and at the end of the assignment will not be retained any information on the subject "Interested", communicating and making all media (of any type of paper and electronic, including images, etc.) to the Client, who will be the keeper, good custodian and carrier even in the possible judicial offices to demonstrate the lawful and correct treatment, and the origin of the data.

If some personal data, or checks on facts and circumstances, were collected c / o "the interested party" part of the case under examination ", the same will have the right not to respond, and in this case will be communicated this will to the client of ' assignment, but no other consequence will result in legitimate silence or non-cooperation in answering questions in the interview;

Furthermore, if the case concerned a pre-contractual relationship, the consequence could be the dereliction of relations with the counterparty and the non-stipulation of agreements / contracts.

Personal data can be communicated and transferred, even with telematic tools, exclusively to our customers, established in Italy in the EU and abroad, and in any case in those countries, which adopt adequate and reciprocal regulations for the data Protection compared to the GDPR 679/2016, or if they result from the lists issued periodically by the European Committee of Guarantors.

The retention times are generally those for the accomplishment of the assignment as described above, that is between **30 days and six months**:

The data are not the subject of systematic archiving on servers, for periods beyond those illustrated for the various purposes and pertaining to the services in the first paragraph described, and according to the purpose and purpose of the assignment (**Prevention** and / or **Defense** in court of legitimate right).

Finally, we would like to point out that the regulation referred to in the European Regulation 679/2016 in Article 15 et seq., Recognizes to each person Physicist or operator concerned, the right to know, at any time, if and what data are processed by part of our Company and to exercise other rights related to their treatment (correction and updating of inaccurate and incomplete data, deletion of any data processed in violation of the law, opposition for legitimate reasons to their use, cancellation for oblivion, and portability of data c / o other server).

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For more information on the processing activities carried out by each of our Group / Network companies connected to us, and for any specific request regarding personal data, you can consult the information on our respective websites of each company directly by referring to our references and contacts indicated below:

Data controller: Ica Finance srl c.f. 05470241216 located in Viale Ascione 12 -80055 Portici-NA- in the person of the pro tempore administrator (Andrea de China domiciled at the company address, contacts tel 081 7393920 also acting as the **Processor - responsible**)

The Controller ICA FINANCE

08 MAGGIO 2018

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ATTACHMENT Disclosure pursuant to art 13 e 14 par. 5 - let. b-d GDPR 679/2016

Article 15

Withdrawal right of the data subject

1. The data subject has the right to obtain from the data controller confirmation that the processing of personal data concerning him or her is in progress and, in this case, to obtain access to personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data in question;
- c) the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if recipients of third countries or international organizations;
- d) whenever possible, the retention period of the personal data provided or, if this is not possible, the criteria used to determine this period;
- e) the existence of the right of the data subject to request the data controller to rectify or delete personal data or limit the processing of personal data concerning him or to oppose their treatment;
- f) the right to lodge a complaint with a supervisory authority ;

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- g) if the data are not collected from the data subject, all information available on their origin ;
- h) the existence of an automated decision-making process, including the profiling referred to in Article 22 (paragraphs 1 and 4) and, at least in such cases, significant information on the logic used, and the importance and expected consequences of such processing for 'interested.
2. Where personal data are transferred to a third country or to an international organization, the data subject has the right to be informed of the existence of adequate safeguards pursuant to Article 46 relating to the transfer.
3. The data controller provides a copy of the personal data being processed. In case of further copies requested by the interested party, the data controller may charge a reasonable fee contribution based on administrative costs. If the interested party submits the request by electronic means, and unless otherwise indicated by the interested party, the information is provided in a commonly used electronic format.
4. The right to obtain a copy as referred to in paragraph 3 must not adversely affect the rights and freedoms of others.

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