

# PRIVACY STATEMENT

# FINCUBE

## Privacy policy, article 13 of the Legislative Decree 196/2003

These pages contain a description of the administration methods of the website concerning the processing of the personal data of users who consult the website. This information is also issued, in accordance with Article 13 of the Legislative Decree 196/2003 (of the so-called Data Protection Code), to those who interact with the web services of Lobis Elements GmbH, which can be accessed by telematic means at the address [www.fincube.eu](http://www.fincube.eu). The information is in compliance with the Letter of Recommendation no. 2/2001, which was accepted by the European Authority for the Protection of Personal Data on the occasion of the meeting of the Institutional Group in accordance with Art. 29 of Directive no. 95/46/EC on the 17th of May 2001 in order to determine certain minimum requirements for the online collection of personal data. Particular attention was hereby given to the modalities, the times and the nature of the information, of which the data controller must inform the users when they access a webpage, regardless of the purpose of the link.

## Data controller

Subsequent to consultation of this website, the data of identified or identifiable persons may be processed: The data controller is the company, Lobis Elements GmbH, which is based in I-39050 Unterinn / Ritten, Hauptstraße 69, Italy.

## Place of data processing

The data processing associated with the web services of this site is performed at Lobis Elements GmbH head office, and is exclusively performed by authorised personal or persons assigned to perform occasional maintenance work. Data acquired via this web service is not permitted to be passed on to third parties. The personal data, which users provide via e-mail in connection with this, are solely used for the performance of the requested services.

## Type of processed data

A) Navigation data. During normal operation, the systems and software processes of this website acquire certain forms of personal data, the transmission of which is an integral part of normal use of internet communication protocols. The information is not collected in order to be able to identify parties involved, however, because of its properties subsequent to processing and in combination with data determined by third parties, the possible identification of users may be facilitated. This type of data includes the IP addresses or the names of the domains of computers used by visitors to the website, the URI addresses of the requested resources (Uniform Resource Identifier), the time of request, the method used to present the request to the server, the size of the file received in response, the status information of the answer given by the server (successful, error etc.) in the form of a numeric code, and other parameters related to the operating system and the computer environment of the user. This data is used solely for the purpose of acquiring anonymous, statistical information in order to ensure that the site functions operate correctly. The data can also be used to determine the responsibility in case of any hypothetical IT infringements that may be detrimental to the website.

B) Data provided voluntarily by the user. The optional, explicit and voluntary forwarding of e-mails to the addresses contained in this website automatically leads to the registration of the sender's address, which is indispensable for the answering of the request, as well as any other personal data included in the message. If the user does not forward this data – even partially – the processing of the user's request may prove impossible.

## Cookies

In this case, none of the user's personal data is collected by the website. Neither any kind of persistent cookies nor user tracing systems are applied. However, the cookies of the so-called "Session" (which are not permanently stored on the user's computer and are deleted when the browser is closed) avoid any recourse to other IT techniques, which do not allow acquisition of personal data, but could lead to the identification of the user, and could, therefore, possibly be prejudicial concerning the confidentiality protection of the user.

## Online collection of personal data – Optional forwarding of data

With regard to the collection of data performed directly via the website, it is hereby declared that, with regard to the collection, only the data that is essentially required for processing is acquired (e.g. when each registration form is completed). However, more detailed information on data privacy can be obtained on the website at any time. Forwarding of the requested data is optional, but may prove to be essential in order to be able to take advantage of the services provided by Lobis Elements GmbH. Therefore, if this data is not forwarded, it may prove impossible for the user to obtain the material requested. In this regard, please observe that the optional and voluntary forwarding of e-mails to the address [info@fincube.eu](mailto:info@fincube.eu) or another e-mail address of this company, or filling in of the forms presented on this website, automatically leads to the registration of the sender's address, which is indispensable for the answering of the request, as well as other personal data included in the message.

## Data processing methods

Personal data is processed with the aid of automated instruments, and are only stored for a period of time that is absolutely necessary for fulfilment of the intended purposes to which it was acquired. Special security measures serve to avoid loss of data, illegal or incorrect use of the data, and unauthorised access.

## The rights of those concerned

For the sake of completeness, we would like to inform you that persons whose data is collected and processed are entitled to special rights in accordance with the Legislative Decree 196/2003. In particular, the person concerned has the right to obtain confirmation from the controller regarding the existence or non-existence of his/her personal data and can request that such data should be made accessible to him/her in a clearly understandable form. Furthermore, the person concerned also has the right to know the source of his/her personal data, the purposes and methods of processing, the applied logic if the data processing is performed by electronic means, the identification details of the controller and the responsible party for data processing, as well as the right to know the identification of the persons or category of persons to whom the personal data was forwarded or those persons who have been informed about the data in question. The person concerned also has the right to demand an update and correction of the data, upon request, the right to demand that additional details should be added, that data should be deleted, converted to an anonymous form or that the data should be blocked, if the processing was performed in an illegitimate manner, and also has the right to demand a confirmation that the measures were also communicated to those persons to whom the data was forwarded or circulated. Finally, the person concerned has the right to object to the processing of his/her data, insofar as justifiable reasons for such an objection exist, and if the data is processed for the purpose of forwarding advertising or direct marketing material, market research or commercial communications. If any of the above should apply, please contact Lobis Elements GmbH, which is based in I-39050 Unterinn / Ritten, Hauptstraße 69, Italy. [info@fincube.eu](mailto:info@fincube.eu).