



**MEDNAV  
GROUP**

**AUGUSTA DUE S.R.L.**  
*www.mednavgroup.it - www.augustadue.it*



## *Augusta Due, commitment and information about privacy.*

**Your privacy is of a paramount importance for Augusta Due and for the other Companies of Mednav group.** That's why we, Augusta Due also on behalf of Mednav group, work to protect our customer's Privacy. Information is fundamental to assure high quality services but our most important investment is our customer's trust. Our priority is to safeguard the information that identify our customers using it only the way they authorise. Our commitment with each single customer consists in:

1. protecting the information they give us according to strict standards of security and discretion.
2. gathering only those personal information indispensable to respond with high quality products, including professional advice about new services and all activities of the Group.
3. allowing access to private information of the costumers only to some of our authorised employees who have been trained on how to deal that kind of information. Any break of the privacy will be followed by a disciplinary measure.
4. not showing our customers data to any third party unless the customers accept its promulgation by signing agreements or giving intentionally their assent. It is understood that the propagation will be done only according to the law.
5. keeping constantly information under control. If Augusta Due intercedes between the customers and other known companies, authorities or institutions, then Augusta Due will ensure that these won't keep customers data unless the customers give their assent or show interest in the products and/or services offered by above companies.
6. informing our customers, at the beginning of the relationship and then at least once a year, how to cancel their names from our list of marketing, assuring also the right to call us at anytime asking for the cancellation of their data from above list.
7. ensuring that all third companies that provide us with supporting services adhere to our standard of protection of the privacy and allow us to check their compliance.
8. passing customers data exclusively to highly reliable agencies and other third parties and only for credit reasons and risk management.
9. forbidding the promulgation – internal and external - of medical data that can identify one or some of our customers. If this kind of information is indispensable to subscribe insurance policies or to provide services, we shall use it only after our customers written authorisation, released at the moment the information is given and only if allowed by the Authorities of the countries where we operate.
10. keeping the files of our customers constantly up-to-dated and complete. Our customers will be told how and where they can have access to their information (according to the law) and how they can notify to us mistakes, if any, that we'll immediately correct.

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We commit ourselves to carry out regular checks upon our operate and upon all our activities in all countries where we operate in order to guarantee the respect of the privacy

Faithfully  
Raffaele Brullo

## **Information art. 13**

### **Privacy Policy**

This report, concerning the privacy policy, describes in details the treatment of personal data of our customers of the services connected to transport area.

This is, also, a piece of information given according to art. 13 of decree dated June 30th 2003 n. 196 which makes reference to the customers of services.

This information has nothing to do with other web-sites linked with us of which Augusta Due is not responsible for.

The instructions below take hint from the guideline of art. 29, directive n. 95/46/CE and they deal particularly with the gathering of personal information found in Internet with the scope of identifying minimum criteria to apply to guarantee the loyalty and lawfulness of such operations. (art. n. 6, 7, 10 e 11, directive 95/46/CE).

### **THE "HOLDER" OF PERSONAL DATA TREATMENT**

The "Holder" of personal data treatment of the information processed after the web-site consultation and the acquisition of personal data and of any other data needed to supply our services somehow linked to the Privacy Policy, as per the information already subscribed, is : Augusta Due and explicitly its legal representative.

The Holder of personal data treatment is **Augusta Due S.r.l.** head office: Viale Gorizia 16/a, Roma ITALY

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## CUSTOMERS RIGHTS

According to Decree **196/2003 art. 7**, people whose personal data are treated, have the right to receive at any time confirmation of the existence of their data in our database and also the right to know the content and the origin, to verify correctness of the same, asking for their integration, updating or correction. They, also, can ask for their cancellation, their change or blockage in case of break of the law, or for proper reasons, set against their treatment.

Requests referred to art. 7, law n.196/2003 have to be address to Augusta Due S.r.l., Viale Gorizia 16/a, Roma ITALY, or writing to following e-mail: [info@augustadue.it](mailto:info@augustadue.it)

## PLACE AND AIM OF PERSONAL DATA TREATMENT

The treatment of personal data related to the web services offered by this site (actually on the server linked to the web inside Augusta Due) takes place at the head office of Augusta Due and is administrated by the employees or consultants appointed for the purpose.

No data regarding web services is reported or promulgated.

Anyway these data can be communicated to previously appointed third parties according to the decree 196/03.

The personal data provided by the customers who gain access to the service, *are used for the service itself only and are not communicated to any third parties unless the communication is forced by the law or it's indispensable to respond to the costumers requests.*

E-mail addresses, for instance, will be used only to provide the service or won't be communicated at all; the employees appointed for personal data treatment of Augusta Due can have access to e-mail addresses only after clear authorisation of the costumers and only for the purpose of the service or to reset the functionality of the service.

Some of these data entered by Augusta Due may be used to get anonymously statistic information about the filling-up of forms make available for the compliance of the privacy; this information can be used to change the items and the layouts displayed by default in the web-site in order to satisfy the new customers needs.

## MODE, TYPES OF TREATED DATA

### Navigation data

The software applied to this web-site, during the ordinary use, acquires in time some personal data which transmission occurs through procedures implicit to Internet protocols of communication.

These data are not gathered for a particular aim but for their own nature, if processed and associated with other information in the hands of third parties, may bring to the identification of the customers.

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In this category are included the IP addresses or computer domains used by the costumers to gain access to the web-site, the URLs (Uniform Resource Locator) of the requested sources, time of the request, mode of the request addressed to the server, size of the file received in response, code of the server answer status (status ok, error... etc) and other parameters regarding the software and the customer area.

### **Cookies.**

Augusta Due will employ “cookies” that allow the user already registered to gain access to the web-site more quickly skipping some data entering. A cookie is a piece of information transmitted from Augusta Due to the computer of the user that consent a faster identification. Anyway, the user can remove the cookies, changing the setting of the browser but this will slow down or deny the access at some parts of the web-site. Personal data are treated by means of proper instruments aimed to guarantee the privacy of the data.

This data are used anonymously exclusively for statistic studies upon the use of the web-site and/or to check its functionality and they are immediately cancelled after being processed.

The data may be also used to ascertain the responsibility in case of possible crimes committed at our web-site damage.

### **Data provided by the costumer (if any)**

The personal data census brings to the acquiring of names (personal data) necessary to provide the services agreed between the parties. These data are filed on hard copies of the server and are protected by authentication and access systems rigorously personal, possessed by each costumer only.

The optional, explicit and wilful sending of e-mails to the addresses listed in this web-site include, for its own nature, according to the decree 196/2003 (protection of people and other subjects in respect of personal data treatment) the treatment of the pertinent information based on principles of fairness, lawfulness and transparency that protect privacy and rights.

Particularly, data which make reference to race and ethnic group, religious faith, philosophic believes, political opinions, adhesion to parties, unions, associations or religious, philosophic, political or unionist organisations, but also information that can disclose the health condition or sexual choices of someone can be treated only after a written authorisation of this person and after authorisation released by the Guarantor of the personal data protection.

According to art. 13 of above decree, please note following information:

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Customer personal data will be treated for the following purposes:

- compliance with fiscal, financial and accounting duties;
- activities planning (planning and monitoring of the customers, of the volume of the work and of internal and external work performances);
- general running of customers/providers;
- administration of legal cases (breaches of contract; warnings; transactions; credit claims; arbitrations; legal controversies);
- despatch of literature of activities and operations related to the company business;
- agreements and pre-agreement requirements i.e. commercial information, compliance with business relationships already in force bonded to products or services provided by Augusta Due, administration and settlement of judicial and/or jurisdictional proceedings;
- compliance with the law in cases such as public invitation to tender and with anything ordered by Authorities and Inspection Institutes and eventually with Regulations;
- marketing carried out by Augusta Due or other appointed companies and relevant targets;
- statistical survey and research of the needs of actual and would-be customers;
- customers satisfaction level regarding the products/services offered by Augusta Due or included in the business area where Augusta Due operate;
- others, bonded to above mentioned purposes.

### **Data resulting from the web service are not promulgated.**

The personal data provided by the customers who gain access to the service, *are used for the service itself only and are not communicated to third parties unless the communication is forced by the law or it's indispensable to respond to the costumer requests.*

E-mail addresses, for instance, will be used only to provide the service or won't be communicated to anybody; the employees appointed for personal data treatment of Augusta Due can gain access to e-mail addresses only after clear authorisation of the costumers and only for the purpose of the service or to reset the functionality of the service.

Some of these data entered by Augusta Due may be used to get anonymously statistic information about the filling-up of forms make available for the compliance of the privacy; this information can be used to change the items and the layouts displayed by default in the web-site in order to satisfy the new customers needs.

### **Not providing personal data or providing wrong personal data could deny the access to information or services required by the customers.**

At any time the customer can exercise his own rights towards the Holder of the personal data treatment, according to the art. 7 decree n. 196/2003 herewith for easy guide:

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Decree n.196/2003, Art. 7

## **Right to gain access to own personal data and other rights**

1. The customer has the right ,even though not yet registered, to have confirmation of the existence of his/her own personal data in the database and communication of above in a readable form.

### **2. The customer has the right to know:**

- a) origin of personal data;
- b) aims and mode of treatment of personal data;
- c) mode of treating personal data by means of electronic instruments;
- d) personal data of the holder, of the persons in charge and of the representative designated according to art. 5, paragraph 2;
- e) who are the third parties to whom his/her own personal data are communicated or people who can come to know above data because they are representatives designated or appointed by Authorities.

### **3. The customer has the right to get:**

- a) up-dating, correction or integration of data;
- b) data cancellation, their change in anonymous form or their blockage in case of break of the law, including when their custody is not compulsory for the purposes they have been gathered and later treated;
- c) the evidence that the content of the operations referred to letters a) and b) has been communicated to those whose personal data have been forwarded or promulgated unless this task turns to be impossible due to the huge employment of means.

### **4. The customer has the right to set totally or partially against :**

- a) his/her own personal data treatment, for significant reasons, even though they are pertinent to the aim of the gathering;
- b) his/her own personal data treatment for marketing or door to door selling or statistic researches or commercial communications.

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