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## PRIVACY POLICY

### INTRODUCTION

This Privacy Policy, issued by LHD s.r.l., relates to the collection and use of personal information through the website [www.lhd.co.com](http://www.lhd.co.com) and the sub-sites accessible through it or linked to LHD domains (e.g. "www.alarlhd.com") (the "Site") in order to inform Users about what type of personal information is gathered, how it is used, which third parties can access it, and how the User can access, update or delete his information.

The Policy has been drafted in accordance with Italian laws (Legislative Decree 196/2003 "Data Protection Code") and the EU Directive 95/46/EC.

Users should read the Privacy Policy before providing their personal information.

### WHAT INFORMATION DO WE COLLECT?

In this Privacy Policy the terms "Personal Information" or "Personal Details" relate to information that is unique to an individual. Information that cannot be defined "Personal Information" under the terms of current laws will be treated as such if it is closely related to personal information in the strict sense.

### 2. BROWSER DATA

When a User navigates the Site, we automatically receive the URL (uniform resource locator) of the Site from which the User originated or visits when leaving the Site, the IP (internet protocol) address of the User's computer, the type of operating system and browser, whether they are using a mobile device, details of the mobile device, the operating system and the name of the device's ISP (internet service provider).

This data is only used to obtain anonymous statistical information on the use of the Site and to check that it is functioning correctly. It is deleted immediately after processing. The data may be used to investigate liability for computer crimes: except in these circumstances, web contact data is not currently kept for more than seven days.

We may also receive information about the User's location, which we will use to improve the services offered by the User for marketing purposes. We may, for example, identify the User's position to inform him or her of offers or promotions in the local area.

### 3. COOKIES

The Site uses cookies and similar technologies. Users can change the cookie settings on their browsers.

For more information about cookies, how they work, click on cookies link from our website.

### 4. CREATION OF ACCOUNT AND COMMUNITY

To create an account, the User must provide the following information: email address, name, surname, gender, nickname, preferred language, address, company name, and other informations.

This information may be gathered using cookies that import data directly from a User's social network account (facebook, twitter, google, linkedin), if the User chooses this option by accessing the site when their social network account is active..

### 5. CUSTOMER CARE

The e-mail addresses and other contact information provided by the User will be used to respond to any queries.

### 6. ONLINE PURCHASES



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To make an online purchase the User may be asked to provide the details needed to create an account. If a purchase is made without an account, details such as name, surname, date of birth, gender, preferred language, shipping address, mode of payment and payment details will be requested in any event. Other information may also be requested.

### 7. NEWSLETTERS

To register for the newsletter service, the User will normally be asked to provide an e-mail address and name only. Other information may also be requested.

### 8. PROSPECTING

The following information will be used to reply to requests for information from Users: name and address, date of birth, gender, preferred language, address. Other information may be requested.

### 9. "CAREER" SECTION

To register for the career section, the following details may be requested: full name and address, educational background, past work experience, languages spoken and other information. Information about membership of protected categories may also be requested.

### 10. HOW WE USE THE INFORMATION

The Personal Details provided by Users will be processed in case of need, for the following purposes. No unnecessary information will be retained.

### 11. PROVISION OF DATA; METHOD OF PROCESSING

The User is under no obligation to provide personal information, however any missing or inaccurate details may make it impossible for the requested services to be provided. The information will be collected and processed electronically and as printed copies, in order to reduce the risk of loss, incident, or unauthorized use by third parties. In any case the User accepts the risk of loss or unauthorized access that may result from the provision of personal information and the Data Controllers decline all liability for any resulting losses.

### 12. PURPOSE OF PROCESSING

#### Browsing the Site

To allow the User to browse the Site and sub-sites easily, and to access their content;

#### Creation of Account and membership of the Community

To allow the creation of a User Account, management of the User's access to the Site, and to allow access to services and content, as well as the carrying-out of activities reserved for registered Users;

#### Customer care

To reply to queries raised by Users;

#### Online purchases

For the management and fulfilment of purchase orders, payment management, shipping of products, aftersales and/or warranty services;

#### Newsletter

For the sending of newsletters requested by the User;



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### LHD events and other initiatives

For the sending of invitations and the organization of events and promotions;

### Marketing and promotional communications

For the sending of marketing communications, advertisements and promotional materials by post, web, telephone, e-mail, video or text message from Italy or abroad (also from non-EU countries), exclusively from LHD, its parent companies, subsidiaries or affiliates, or individuals and companies, who may assist with LHD marketing campaigns.

### Recruitment and hiring

For the selection and sourcing of staff by LHD and/or recruitment agencies.

## 13. WHO CAN ACCESS THE INFORMATION

### LHD and its sales network

The User's Personal Information can be accessed by any legal representative of LHD and/or its subsidiaries, affiliates and parent companies worldwide (the "Group"), employees of LHD and the Group involved in the provision of products and services for the purposes indicated in this Privacy Policy, authorized to access the information as part of their duties.

The information may also be accessed by companies and individuals in the LHD sales and service network, franchisees, sponsors and licensees anywhere in the world, who may process the information in the capacity of independent data controller.

### Service providers

The User's Personal Information can be accessed by anyone collaborating with LHD in relation to the provision of products or services through the Site. By way of example only, these parties may include firms responsible for management and maintenance of the Site, electronic and online tools, the sending of newsletters, the shipping and delivery of products, the management of payments, aftersales, the processing of market research, events management and the sending of business communications.

With regard to the "Career" section, Personal Information may be communicated to recruitment firms and temp agencies.

Insurance companies and consultants assisting LHD with legal, fiscal, social security, accounting and business issues may also access the data.

### Public authorities

The Personal Information may be disclosed to public authorities where required by law.

### Other Users

Some of the Personal Information such as the User's nickname and/or Image, and any other information published by the User on his/her profile and/or in communications through the blog or community may be accessible to other Users if the User decides to allow it.

### Statistical data

Statistical data on the Site, the database, sales and the number of users may be sent to third parties for verification and technical purposes. This information will not include details that allow users to be identified.

### Transfer of Information to non-EU countries



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The User's Personal Information may be transferred abroad, in accordance with current laws, and may also be sent to non-EU countries where the Company has business interests, if they are able to guarantee an adequate level of protection.

### Circulation

The User's Personal Information will not be circulated.

However, certain details such as the User's nickname and/or image, and any other information published by the User on his/her profile or in other communications on the Site, will be accessible to other Users when the User chooses to participate in the blog or Community.

Some of the Personal Information supplied by the User may also be circulated during specific events (online competitions or promotions).

### 14. RIGHTS OF THE USER

The User ("data subject") may, at any time, exercise his or her rights under current legislation and in particular under Article 7 of Legislative Decree 196/2003 ("Italian Data Protection Act"). These include the right to obtain confirmation of the existence of personal information concerning the User, to amend the information, request its cancellation, know the purpose and method of processing, object to processing particularly for the purposes of the sending of advertising or direct selling materials, or for market research and promotional communications.

### 15. CONSENT

The User will be provided with the Privacy Policy when the Personal Information is uploaded.

The information will be processed in order to: fulfil the User's request for a User Account and for access to the services, content and reserved activities, reply to requests by the User, for technical/organizational communications, for the management and fulfilment of purchase orders, for the delivery of products, for access to warranty and/or aftersales services, for the sending of newsletters and for recruitment purposes. Consent is not required for such purposes.

The User may also be asked to provide express consent for LHD s.r.l. to access his/her personal information as indicated in the Privacy Policy in order to participate in events and promotions, for market or statistical research purposes, for the sending of promotional or marketing communications, advertisements or offers of goods or services by post, web, telephone, e-mail, video or text message, exclusively by LHD, parent companies, subsidiaries or affiliates or by individuals or companies involved in the commercial operations of LHD (or another vendor).

The User's consent also allows LHD to communicate the Personal Information and/or send it abroad, in accordance with the contents of this Privacy Policy.

### 16. AMENDMENTS TO THE PRIVACY POLICY

The Privacy Policy may be updated or amended. LHD will notify Registered Users of any such changes.

Unregistered users are asked to visit the Privacy Policy page (accessible through the "Legal" link) from time to time, in order to view the up-to-date information.

### 17. CONTACTS

Requests for information about the use of Personal Information can be sent to [customercare@lhd.co.com](mailto:customercare@lhd.co.com).

For further details, visit <http://ec.europa.eu/justice/data-protection/>

