



Personal data treatment statement

According to the art. 13 of the Code of Privacy (D. Lgs. 196/2003), Mobile Solution s.r.l provides information on the processing and treatment of your personal data according to the provided services.

I. Collection of personal data

The personal data are collected when you register to www.skebbby.com or through the mobile application.

The personal data could be collected through third parties (for example, friends or relatives) using the services that allow the latter to send information to the acquaintances. In such a case, your personal data (name, last name and e-mail address or number of mobile) will be registered and used only to send you on behalf of the subjects that have provided your data, a message containing such information (for example, the invitation to sign up to our services), together with this statement available at <http://www.skebbby.com/index/privacy-business/> you are entitled to request to Mobile Solution s.r.l the cancellation of your data at any time.

Your data could be collected through the use by your friends or acquaintances of services which enable them to know which mobile operator is used by their acquaintances. In such a case, Mobile Solution s.r.l will use your number only to associate to it the mobile operator used and allowing your acquaintances, signed up to www.skebbby.com, to use the services offers through Skebbby application (delivery free or low cost text messages, least cost routing services etc.). In any case, the processing of your number will be without any further personal data of yours and thus not to be able to identify yourself.

II. Purpose of data treatment and processing

The personal data collected, together with NY other data related to the electronic communications you will be able to carry out using our services, will be processed by Mobile Solution s.r.l for the following purposes:

1. Provision of the communication services offered by Mobile Solution S.r.l.

To allow you to use of Skebby and its services (like for example, sending text messages, to manage your account and join the Forum, Chat, Blog, etc.), it is necessary that Mobile Solutions s.r.l have some of your personal data (name, last name, e-mail address, username and password, mobile number) and data related to electronic communication carried out by you and collected during the provision of Skebby service.

Moreover, your number of mobile will be used to allow those who took part of the community of Skebby or any third party that already know if you are registered to the services through Skebby.

The data will be used for time required to fulfill these purposes, through the adoption of suitable measures to guarantee the respect of your confidentiality and, where possible, in anonymous form.

The unencrypted text of the messages sent or received by you, the password to allow the access (sign in) to the sites of the operators that offer free SMS as well as the sites that offer information service and devices concerning the management of your account on www.skebby.com, will not be read or known by the staff of Mobile Solution s.r.l or by companies which could take advantage from the provision of the same services.

2. Delivery of commercial and advertising data.

Your personal data could be used to send you information messages regarding the opportunities and the promotions of which you may benefit as our user. In particular, your data could be used for:

- a. delivery of promotional information, advertising and premium contest;
- b. commercialization of products and services, delivery of advertising /informative/promotional material;
- c. market researches and surveys also by means of telephone interviews and delivery of questionnaires;
- d. economic analyses and statistics;
- e. participation to marketing initiatives and offer devoted to reward the customers;
- f. promotion of telephones and data transmission services, as well as capable added value electronic communication services;
- g. interactive commercials and joining to premium contest;
- h. customers' satisfaction surveys referring to the quality of the provided services.

The advertising messages by MMS, SMS, WAP and e-mail could be sent both after your specific request (pull messages) or through an automated system of delivery (push messages).

The treatment for advertising purposes by means of the activities indicated to letters from A) to H), could be concerning products and services offered by Mobile Solution s.r.l., as well as products and services offered by third parties. In the latter case, your data will not be subject of communication to these third parties.

The consent to the data processing given for advertising purposes could be revoked by you in any moment, contacting Mobile Solution s.r.l at the following e-mail address privacy@skebby.com.

In case you decide to use the free "SMS Skebby 0 cent service" for the delivery of the SMS - the eventual refusal to the treatment and processing of your personal data for such

advertising purposes will prevent you from taking advantage of the free services but you could continue to use "Classic or Basic SMS service" for delivery of paid for SMS.

With the exception of "SMS Skebby 0cent service" the eventual refusal to the treatment and processing of your personal data for advertising purposes will not influence on the provision of other SMS services "Classic or Basic SMS", but it will determine the impossibility of keeping you updated on offer and promotional deals dedicated to Skebby users signed up on www.skebby.com.

The personal data used for the above-mentioned advertising purpose will be kept for the strictly necessary time, and however, for a time up to 24 months.

3. Further purposes

Your personal data, included the data related to the electronic transmission traffic, could be used also for further purposes whose: billing, control and management of the correct operation of the services offered by Mobile Solution s.r.l., management of eventual claims and litigations, implementation of the obligation scheduled by national of EU laws, related regulations and provisions, in particular, to the protection of the public order and to the assessment and repression of the crimes.

III. Treatment of sensitive data

During the use of the services (example participating to the Forum, Chat, Blog, etc), you could provide us with sensitive data (that is the personal data suitable to reveal your ethnic racial origin and, your religious, philosophical belief or of other kind, the political opinions, the adhesion to parties, labor unions, associations or organizations with religious, philosophical, political orientation, as well as suitable data to reveal your state of health and your sexual life). The processing of your sensitive data, from Mobile Solution s.r.l., is not indispensable for the purpose of the distribution of the services requested by you. However, they could be handled by Mobile Solution s.r.l only after your written consent that it will be requested to you at sign up.

Let it be understood that the sensitive data's processing operations by Mobile Solution s.r.l do not include their communication to third parties or their diffusion, except what it is in accordance with any law obligation.

Therefore should you (decide to) use Skebby services to communicate or disseminate sensitive personal information, it will not be possible to represent such operations as processing performed by Mobile Solution s.r.l., since use of the account and web space allocated to you on www.skebby.com website is available to yourself alone.

IV. Data management and safety measures

The data will be managed as described previously using paper or electronic methods, and logical processes strictly related to the same purpose, and will adopt measures which

guarantee security and privacy, according the Privacy Code and s.m.i, and Guarantor provisions for the protection of personal data.

Your data will be stored on the server of Mobile Solution s.r.l., located in appropriate spaces provided by the company KPNQwest Italia SpA - via Leopardi, 9 - 20123 Milano Italy. Such company will be in charge of the Processing of your personal data, according to the instructions provided to them by Mobile Solution s.r.l.

In any case, the personal data will be processed, where possible, in anonymous way and stored, according to any processing purposes, for the time established from the law and/or the provisions adopted from the Guarantor for the protection of the personal data, and, once ended, will be cancelled or made anonymous.

V. Holder, responsible and people in charge of data treatment and processing

The Holder of your data treatment and processing is Mobile Solution s.r.l., with operation Office in Via Melzo, 12 - 20129 Milan (MI) - Italy.

Inside Mobile Solution s.r.l your personal data will be used from MS employee designated in charge of the processing, everyone of them according to their related duties, and operate under the direct authority of the processing Holder, from which they have received adapted operating instructions.

Your data will be handled also from the company KPNQWEST Spa Italy where the server used by Skebby are located, as well as by the company Engine Technology s.r.l for purpose of technical management of the server and the license to the distribution of the services.

Moreover, part of your personal data processing could be performed also by other third parties. Particularly, the data could be communicated to:

1. entities that provide assistance and support to Mobile Solution s.r.l.;
2. entities that perform activity of promotion and sale of services offered by Solution Mobile s.r.l.;
3. subjects that lend services of credit risk management and prevention and fraud control;
4. other TLC operators used by Mobile Solution s.r.l for services provision.

In any case, such subjects will operate as independent Holders or will be designated like managers or people in charge of the data processing. The managers or the people in charge designated will receive suitable operating instructions, also with reference to the adoption of the minimal safeguard measures.

VI. Customer rights

You are entitled to know the existence or not of your personal data and to obtain their communication in intelligible way. Moreover you are entitled to obtain:

1. the indication of the origin of the personal data;
2. the indication of the purposes and data treatment and processing features;
3. the indication of the logic applied if the data are processed with the aid of electronic instruments;
4. the Updating, the rectification or integration of the data;
5. the deletion, the transformation in anonymous form or the block of the same ones;
6. the indication of the identification details of the holder, the managers and the representative designated in the territory of the Italian State, where scheduled;
7. the indication of the subjects or the categories of subjects to whom the personal data may be communicated or that they may get to know as representative designated in the territory of the Italian State, or people in charge;
8. the Certification that the operations of which the 2 last previous point points they have been made aware of, also regarding their content, of those people to which the data have been communicated or diffuse, except the case in which such implementation should be impossible or involves the employment of means manifestly disproportionate regarding the protected right;
9. to be informed about the holder, the purposes and the data processing conditions the and about the eventual responsible, about the subjects or categories of subjects to which the personal data may be communicated.

It's your right, also, to disagree, in all or partially: i) to the handling, for rightful reasons of your personal data, if proper to the purpose of the collection, except the limits established from the law; ii) to the treatment of your personal data to the aim of delivery advertising material or for the fulfillment of promotional communication or market researches, provided that in such a case you will be able to use the paid for services only.

For this purpose, you will be able to address, through a written communication, to Mobile Solution s.r.l., Via Melzo n.12, 20129 Milan or privacy@skebby.com, to whom you could request, moreover, the updated directory of the of identification details of the data handling managers eventually designated and the other subjects to whom your data are communicated.