

Information on the processing of Customers' personal data

Execution of the Contract

Mr. Anthony Bianchi, in his capacity as Legal Representative of BDS69 S.r.l., with registered office in Via IV Novembre, 69 – 00043 Ciampino (RM) CF and VAT number 05764431002 (hereinafter, "Data Controller"), as data controller, informs you pursuant to art. 13 of Legislative Decree no. 196 of 30.6.2003 (hereinafter, the "Privacy Code") and art. 12, 13 and 14 of EU Regulation no. 2016/679 (hereinafter, "GDPR") that your data will be collected for the purpose of concluding the contract and will be processed in compliance with the aforementioned legislation in order to guarantee the rights, fundamental freedoms, as well as the dignity of natural persons, with particular reference to confidentiality and personal identity. We inform you that if the activities provided to you involve the processing of personal data of third parties, in your ownership it will be your responsibility to ensure that you have complied with the provisions of the law with regard to the Data Subjects in order to make their processing by us legitimate.

Your data will be processed in the following ways and for the following purposes:

Object of the Processing

The Data Controller processes personal identification data such as, for example:

name, surname, company name, address, telephone, e-mail, tax code and/or VAT number, bank and payment references such as credit and debit cards provided as a guarantee and/or balance; hereinafter, "personal data" or "data", communicated by you when proposing offers, orders and concluding contracts for the services of the Data Controller.

Processing methods

The processing of your personal data is carried out by means of the operations indicated in art. 4 of the Privacy Code and art. 4 n. 2) GDPR and precisely: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, limitation, communication, deletion and destruction of data. Your personal data is processed both on paper and electronically and/or automatically.

Purpose of the processing

In compliance with current legislation on the protection of personal data and **without the need for specific consent from the Data Subject**, the Data will be stored, collected and processed by the Company for the following purposes:

- a) fulfilment of contractual obligations, execution and/or stipulation of the contract with the Client and/or management of any pre-contractual measures;
- b) fulfilment of any regulatory obligations, tax and tax provisions deriving from the performance of business activities and obligations related to administrative-accounting activities;

The legal bases of the processing for the purposes a) and b) indicated above are art. 6.1.b) and 6.1.c) of the Regulation.

The provision of Data for the aforementioned purposes is optional, but any failure to provide the Data and refusal to provide them would make it impossible for the Company to execute and/or stipulate the contract and provide the services required by it.

Communication

The data may be communicated to third parties appointed as data processors pursuant to Article 28 of the GDPR and in particular to banking institutions, companies active in the insurance field, suppliers of services strictly necessary for the performance of business activities, or to company consultants, if this is necessary for fiscal, administrative, contractual reasons or for needs protected by current regulations.

Your personal data, or the personal data of third parties in your ownership, may also be communicated to external companies, identified from time to time, to which BDS69 S.R.L. entrusts the execution of obligations deriving from the assignment received, to which only the data necessary for the activities requested will be transmitted. All employees, consultants, temporary workers and/or any other "natural person" who carry out their activities on the basis of the instructions received from BDS69 S.R.L., pursuant to art. 29 of the GDPR, are appointed as "Data Processors" (hereinafter also referred to as "Data Processors"). BDS69 S.R.L. issues appropriate operating instructions to the Persons in Charge or Data Processors, if any, in order to guarantee the confidentiality and security of the data. With reference to the aspects of personal data protection, the Customer is invited, pursuant to art. 33 of the GDPR to report to BDS69 S.R.L. any circumstances or events from which a potential "data breach" may arise in order to allow an immediate assessment and the adoption of any actions aimed at countering such event by sending a communication to BDS69 S.R.L. at the addresses indicated below.

The Data will not be disseminated.

This is without prejudice to BDS69 S.R.L.'s obligation to communicate data to Public Authorities upon specific request.

Moving abroad

The transfer of your personal data abroad may take place if it is necessary for the management of the assignment received. For the processing of information and data that may be communicated to these subjects, the equivalent levels of protection adopted for the processing of the personal data of their employees will be required. In any case, only the data necessary for the pursuit of the intended purposes will be communicated and the regulatory instruments provided for in Chapter V of the GDPR will be applied.

Methods, logic of processing and storage times

Your data are collected and recorded lawfully and correctly for the purposes indicated above in compliance with the principles and requirements of art. 5 c 1 GDPR.

The processing of personal data is carried out using manual, computer and telematic tools with logics strictly related to the purposes themselves and, in any case, in such a way as to guarantee their security and confidentiality.

Personal Data will be processed by BDS69 S.R.L. for the entire duration of the assignment and also subsequently to assert or protect its rights or for administrative purposes and/or to execute obligations

deriving from the applicable pro tempore regulatory and regulatory framework and in compliance with specific legal obligations on data retention.

The Data Controller will keep it for no more than 10 years from the termination of the relationship for the Service Purposes.

Rights of the Data Subject

In accordance with, within the limits and under the conditions provided for by the legislation on the protection of personal data regarding the exercise of the rights of the Data Subjects, with regard to the processing covered by this Policy, as a Data Subject you have the right to request confirmation as to whether or not your personal data is being processed, access the personal data concerning you and in relation to them you have the right to request its rectification, the erasure, the notification of rectifications and cancellations to those to whom the data may have been transmitted by our Organization, the limitation of processing in the cases provided for by the law, the portability of the personal data - provided by you - in the cases indicated by the law, to object to the processing of your data and, specifically, you have the right to object to decisions concerning you if based solely on automated processing of your data, Profiling included. In the event that you believe that the processing of your data violates the provisions of the GDPR, you have the right to lodge a complaint with the Guarantor pursuant to art. 77 of the GDPR.

How to exercise your rights

You may exercise your rights at any time by sending:

- a registered letter with acknowledgement of receipt to the registered office of the Data Controller, Via IV Novembre, 69 – 00043 Ciampino (RM);
- an e-mail to info@bds69.com

Data Controller

Data Controller, pursuant to art. 4 of the GDPR, is BDS69 S.R.L., Via IV Novembre, 69 – 00043 Ciampino (RM) CF: 05764431002 and VAT 05764431002

Responsible and authorized persons

The updated list of data processors and persons authorised to process data is kept at the registered office of the Data Controller.

Website Cookie Policy

Dear Visitor (hereinafter, "**You**" or the "**User**"),

This [website www.bds.com](http://www.bds.com) and all sites related to it, (hereinafter, the "**Site**") are the property of the company:

BDS69 S.r.l.

Via IV Novembre, 69
00043 Ciampino (RM)
Tax Code and VAT Number 05764431002

The details that allow you to quickly contact **BDS69 S.R.L.** and to communicate directly and effectively with the same, including the e-mail address, are as follows:

Switchboard +39 081 5262173 Fax +39 081 3030848
E-mail info@bds69.com PEC bds69@pec.it
(hereinafter, "**BDS69 S.R.L.**", "**We**", "**Us**" or the "**Company**").

Since cookies are used on our Site for various purposes, with this policy, drawn up pursuant to art. 13 of Legislative Decree no. 196 of 30.6.2003 (hereinafter, the "Privacy Code") and art. 12, 13 and 14 of EU Regulation no. 2016/679 (hereinafter, "GDPR") as well as the provision of the Italian Data Protection Authority no. 229 of 8 May 2014, we want to explain what cookies are and how they are used on the Site.

Some cookies (so-called first-party or first-party cookies) are conveyed and controlled directly by us. Through these cookies, the Company collects and processes certain personal data concerning you. In this policy, pursuant to art. 13 of EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter, "**Regulation**"), we explain how we collect this data, for what purposes and what your rights are.

Other cookies (so-called third-party cookies) are, on the other hand, conveyed and controlled by third parties. On this policy you will find links to the policies published by these third parties, which we ask you to read carefully. If you are not familiar with cookies, please read this policy and the Site's general privacy policy carefully so that you are aware of your choices.

The Data Controller takes into utmost consideration the right to privacy and protection of its Users' personal data. For any information relating to this Cookie Policy, Users may contact the Data Controller at any time, using the following methods:

- By sending a registered letter with acknowledgement of receipt to the registered office of the Data Controller (to the address Via IV Novembre, 69 - 00043 Ciampino (RM) – Italy);
- By sending an e-mail message to info@bds69.com
- By sending a certified e-mail message (PEC) to the address bds69@pec.it

A. What are cookies and what are they used for?

Cookies are small text files that the sites visited by the user send directly to the user's terminal (usually to the browser), where they are stored and then retransmitted to the same sites on the next visit by the same user (so-called "cookies"). **first-party cookies**). While browsing a site, the user may also receive cookies from different sites or web servers on his or her terminal (so-called cookies). **third-party cookies**); This happens because the visited website may contain elements such as, for example, images, maps, sounds, specific links to web pages of other domains that reside

on servers other than the one on which the requested page is located. In other words, they are those cookies that are set by a website other than the one you are currently visiting.

Cookies can have a duration limited to a single browsing session on the browser (so-called "cookies"). **session cookies**), and in this case they are automatically deactivated when the user closes the browser; or they may have a predetermined expiration date and, in this case, they will remain stored and active on your hard disk until that expiration date, continuing to collect information during different browsing sessions on the browser (so-called "expiration date"). **persistent cookies**).

Cookies are used for various functions. Some are necessary to allow you to browse the Site and take advantage of its features (so-called "cookies"). **technical cookies**). Others are used to obtain statistical information, in aggregate or non-aggregate form, on the number of users who access the Site and how the Site is used (so-called "cookies"). **analytics cookies**). Others, finally, are used to track your consumer profile and make you see advertisements on the Site that may be of interest to you, as they are consistent with your tastes and consumption habits (so-called "Consumer Ads"). **profiling cookies**). To learn more about these different categories of cookies, continue reading this policy. Find out how they work and what they are used for, and freely choose whether to consent to their use or prevent it.

B. Technical cookies

Technical cookies are used on the Site for the sole purpose of making it possible for you to browse the Site and allow you to use its features. These are always first-party cookies, as they are conveyed directly by us on the Site. Some technical cookies are essential to offer you an optimal browsing experience or to allow you to authenticate yourself on the site, for example to make a purchase on the site or enter your reserved area (so-called "cookies"). **navigation cookies**). Navigation cookies are normally session cookies and, therefore, once the browser is closed, they are automatically deactivated.

Other technical cookies are useful to allow you to memorize some of your preferences (for example, the language or the country of origin) without having to reset them during subsequent visits (so-called "cookies"). **Functionality cookies**). For this reason, functionality cookies are often persistent cookies, as they remain stored on your computer even after you close your browser, until their expiration date or until you have decided to delete them.

HTTP / Session

Nome Cookie	Finalità	Modalità / Durata
PHPSESSID#	Preserva lo stato dell'utente attraverso le pagine visitate	HTTP / Sessione

As required by current privacy legislation, your prior consent is not required for the installation of these cookies. Of course, you are free to block the installation of technical cookies by changing the settings of your browser (see paragraph E, no. 1 to find out how to do this). Please note, however, that by blocking the installation of technical cookies, or subsequently deleting them, the ability to access the Site, to use all or part of it, to enable or disable certain functions or to receive certain services could be totally or partially compromised.

C. Analytics cookies

Analytics cookies are used on the Site to collect statistical information, in aggregate form, on the number of users who access the Site and how they visit the Site.

Pixels / SessionTracks the user across devices and marketing channels, therefore they will be installed without your prior consent:

BDS69 S.r.l.
Via IV Novembre, 69
00043 Ciampino (RM)
Email info@bds69.com | Tel: 0665010766
P.IVA 05764431002



Nome Cookie	Identificazione Terza parte	Finalità	Modalità / Durata
_ga	google-analytics.com	Registra un ID univoco che viene utilizzato per generare dati statistici su come il visitatore utilizza il sito web.	HTTP / 2 anni
_gat	google-analytics.com	Utilizzato da Google Analytics per limitare la frequenza delle richieste	HTTP / 1 giorno

_gid	google-analytics.com	Registra un ID univoco che viene utilizzato per generare dati statistici su come il visitatore utilizza il sito web.	HTTP / 1 giorno
collect	google-analytics.com	Utilizzato per inviare dati a Google Analytics in merito al dispositivo e al comportamento dell'utente. Tiene traccia dell'utente su dispositivi e canali di marketing	Pixel / Sessione

The cookies used by this website result from the use of [Google Analytics](#), which is an analytics tool from Google that helps website owners understand how visitors interact with their content. For more information, please read: [Types of cookies used by Google](#), [Google Analytics, Cookie Usage on Websites](#) and [Data Protection](#).

Of course, you are free to block the installation of analytics cookies at any time, without compromising your ability to visit the Site and use its contents. To find out how to do this, please read the analytics cookie policies carefully by following the links above.

D. Profiling cookies

Profiling cookies are used to create a user profile of you, based on the preferences and tastes you have expressed while browsing the Internet, and to display advertising messages consistent with your profile. In this way, the advertising messages that you may see on our website may be of more interest to you.

As required by current privacy legislation, your prior consent is required for the installation of these cookies.

HTTP / [1 month](#) uses **third-party profiling cookies**.

Nome Cookie	Identificazione Terza parte	Finalità	Modalità / Durata
NID	https://policies.google.com/privacy?hl=it	Registra un ID univoco che viene utilizzato per generare dati statistici su come il visitatore utilizza il sito web.	HTTP / 6mesi
_Secure-3PSIDCC	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
_Secure-3PSIDTS	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
_Secure-1PSIDTS	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione

SSID	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
_Secure-1PSIDCC	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
SAPISID	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
SID	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
SIDCC	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
_Secure-3PAPISID	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
_Secure-1PSID	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
_Secure-3PSID	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
APISID	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione
Cookie Name	Purpose	Mode / Duration	PHPSESSID#
Preserve user status across visited pages	HTTP / Session	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / Sessione

AEC	https://policies.google.com/technologies/cookies?hl=en	Utilizzato da Google per l'autenticazione degli utenti, la sicurezza della navigazione, al fine di prevenire frodi e proteggere l'interazione dell'utente con il servizio.	HTTP / 6 mesi
CONSENT	https://policies.google.com/technologies/cookies?hl=en	Cookie Name	Third Party Identification
Purpose	Mode / Duration	_Ga	google- analytics.com 6 mesi
It registers a unique ID that is used to generate statistical data about how the visitor uses the website.	HTTP / 2 years	_Gat	google- analytics.com
Used by Google Analytics to limit the frequency of requests	HTTP / 1	Memorizza le preferenze e le informazioni dell'utente ogni volta che visita pagine web contenenti mappe geografiche di Google Maps	HTTP / Sessione
_gid	google-analytics.com	It registers a unique ID that is used to generate statistical data about how the visitor uses the website.	HTTP / 1 day

E. How to manage cookies and object to their use

There are several options for managing, disabling, and deleting cookies.

(1) Change your browser settings

Follow the instructions provided by the manufacturer of the browser you use to find out how to manage, disable or delete all cookies (technical, analytics and profiling):

Explorer: <https://support.microsoft.com/en-us/kb/196955/it>

Chrome: <https://support.google.com/chrome/answer/95647?hl=it>

Firefox: <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie>

Safari: https://support.apple.com/kb/PH17191?locale=it_IT

Artwork: <http://help.opera.com/Windows/10.00/it/cookies.html>

Make your choices carefully. By indiscriminately blocking the receipt of all cookies, including technical cookies, without providing a specific exception for the Site, you may, in fact, no longer be able to browse the Site or use all or part of its features. In addition, by deleting all cookies from your browser, technical cookies may also be removed and, therefore, you may remove the preferences you have set when using the Site or no longer find the products or services placed in your shopping cart.

(2) Use interactive tools provided by BDS69 S.R.L. and third parties

To disable analytics cookies, you can simply use the tools indicated in paragraph E of this policy.

To disable third-party cookies, consult the privacy policies of third parties that install profiling cookies (see paragraph D above) to learn about the other tools at your disposal to manage, disable and delete cookies, and more generally to oppose their use. Remember that, by disabling third-party cookies, (i) you oppose their use not only on the Site but on all Internet sites on which these cookies are used and (ii) the ability to browse the Site and use its features will not be affected in any way. When you disable third-party cookies, you will still see the banner on the home page of the Site relating to cookies; In this case, however, by closing the banner, scrolling the home page or clicking on any element of the home page outside the banner, you will not receive any third-party cookies that you have correctly disabled.

(3) **Use the website www.youronlinechoices.eu/it/**

Your Online Choices is a website managed by the non-profit association *European Interactive Digital Advertising Alliance* (EDAA), whose Italian version can be reached at www.youronlinechoices.eu/it/, which provides information on behavioural advertising based on profiling cookies (<http://www.youronlinechoices.com/it/a-proposito>) and allows Internet users to easily oppose (opt-out) the installation of the main profiling cookies installed by advertisers and used on Internet sites (<http://www.youronlinechoices.com/it/le-tue-scelte>). Before using this tool, we recommend that you carefully read the General Terms of Service of the Your Online Choices website (<http://www.youronlinechoices.com/it/condizioni-general-di-servizio>), the Frequently Asked Questions (FAQs) (<http://www.youronlinechoices.com/it/faqs>) and the user guide (<http://www.youronlinechoices.com/it/help>). Use Your Online Choices consciously. Although, in fact, Your Online Choices brings together many of the most important advertising companies in the world that use cookies, some of the third parties that install cookies through the Site may not have adhered to Your Online Choices. Therefore, using Your Online Choices does not guarantee that you will receive third-party cookies while browsing the Site. Remember, too, that by deleting all cookies from your browser, even the technical cookies issued by Your Online Choices to remember your choices may be deleted, making third-party cookies active again.

F. Data processing methods and storage times

As highlighted in the preamble to this policy, the Company collects and processes some of your personal data through the cookies that it conveys directly on the Site (first-party cookies) and through third-party cookies. For first-party cookies, the Company acts as the data controller of this data, in accordance with the provisions of the Regulation. We will process your data only with electronic tools, in a fully automated way and without human intermediation. Therefore, our employees and contractors will never access the content of your personal data obtained through cookies, which means that they will never be able to access and/or have direct personally identifiable information (IPI).

Some of our employees and collaborators, appointed by us as Persons Authorized to Process, may carry out maintenance work on the computer systems that host your data, without ever being able to access their actual content. Personal data may be stored on servers managed by third parties (e.g. IT system providers) or may be managed by subjects specialized in online advertising, who act as external data processors on the basis of a specific written appointment by the Company. We inform you that, in compliance with the conditions and guarantees established by the Regulation, your data may be transferred to countries outside the European Economic Area, which may not offer a level of privacy protection and personal data protection comparable to that guaranteed by Italian and European privacy laws, but as the data controller we will take data security into the utmost consideration. Therefore, we will proceed with the management of such transfers with all due caution and guarantees. Your personal data will not be disclosed to third party data controllers or disseminated.

G. Your rights

To exercise your rights, or obtain any further information or clarification in relation to this Cookie Policy, please contact the Data Controller in the following ways:

- By sending a registered letter with acknowledgement of receipt to the registered office of the Data Controller (to the address Via IV Novembre, 69 - 00043 Ciampino (RM)- Italy);
- By sending an e-mail to the address info@bds69.com;

Pursuant to the Regulation, the Data Controller informs that Users have the right to obtain the indication of (i) the origin of the personal data; (ii) the purposes and methods of the processing; (iii) the logic applied in the case of processing carried out with the aid of electronic tools; (iv) the identification details of the Data Controller and Data Processors; (v) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as data processors or persons in charge of the processing.

In addition, Users have the right to obtain:

- a) access, updating, rectification or, when interested, integration of data;
- b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- c) certification that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfilment proves impossible or involves the use of means manifestly disproportionate to the right protected.

In addition, Users have:

- a) the right to withdraw consent at any time, where the processing is based on their consent;
 - b) (where applicable) the right to data portability (the right to receive all personal data concerning them in a structured, commonly used and machine-readable format), the right to restriction of the processing of personal data and the right to erasure ("right to be forgotten");
 - c) The right to object:
 - i) in whole or in part, for legitimate reasons, to the processing of personal data concerning them, even if pertinent to the purpose of the collection;
 - ii) in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication;
 - d) if they believe that the processing of their personal data violates the Regulation, the right to lodge a complaint with a Supervisory Authority (in the Member State in which they habitually reside, in the one in which they work or in the one in which the alleged violation occurred). The Italian Supervisory Authority is the Italian Data Protection Authority, with registered office in Piazza di Monte Citorio n. 121, 00186 - Rome (<http://www.garanteprivacy.it/>).
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BDS69 S.r.l.
Via IV Novembre, 69
00043 Ciampino (RM)
Email info@bds69.com | Tel: 0665010766
P.IVA 05764431002



The Data Controller is not responsible for updating all the links that can be viewed in this Cookies Policy, therefore whenever a link is not functional and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to by such link.

This page is visible, through links at the bottom of all the pages of the Site pursuant to art. 122 second paragraph of Legislative Decree no. 196/2003 and following the simplified procedures for the information and acquisition of consent for the use of cookies published in the Official Gazette no. 126 of 3 June 2014 and related register of measures no. 229 of 8 May 2014.