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## 1. FUNDAMENTAL PRINCIPLES

### Introduction

The Service Charter of SEAT Pagine Gialle SpA (SEAT) is a point of reference in relationships with all clients and defines the Company's commitments to its Clients in terms of the provision of the services it envisages.

The Charter bears witness to the Company's commitment to act in such a way as to achieve constant improvement to its quality standards in relation to its Clients' needs and expectations and to simplify, enhance, and increase the transparency of its Client relations.

The Charter defines service standards such as continuity, regularity, and punctuality, to be considered valid under normal operating conditions, and provides indications as to how to send notices, suggestions, requests for clarification, and complaints to the Company.

SEAT will inform the Communications Regulator and its Clients of any amendments to the Charter.

The SEAT Service Charter is compliant with the principles and provisions set out in Communications Regulator Resolutions 179/03/CSP and 254/04/CSP.

### 1.1 SEAT PAGINE GIALLE – The Company

#### According to article 4 of the Bylaws:

*"The purpose of the Company is to operate in the industry and trade of publishing, printing and graphics in general, in any form and by any means, including online; to gather and engage in advertising — including for the account of third parties — in any form and for any means of communication, including the exchange for goods or services; management of activities, including promotional activities, in the field of advertising communication and public relations initiatives; engaging in, preparing and selling, with all technological means and any other transmission support, including online and via the Internet, all types of documentation services concerning however the various forms of economic activities, including but not limited to databases and support services for trading goods and services; managing all activities related to information processing and use of any type and in any manner, including the use and sale of communication services of any type, and therefore also telematic and electronic, by any instruments and means, including management of electronic communication networks, and any related, complementary or instrumental production and sales activity in the areas mentioned above.*

*The Company may also engage in all operations — i.e. commercial, in securities, in real estate, industrial, and financial (with the latter not performed vis-à-vis the public) — functionally connected with the corporate purpose; for this purpose, it may also directly or indirectly acquire as an exception and in accordance with law, interests and holdings in other corporations or companies, expressly excluding any activities inherent to raising of public funds and any other activities not permitted by law."*

As pertains to Directory Assistance services in particular, pursuant to resolution 15/04/CIR, article 2, SEAT Pagine Gialle SpA is authorised to provide subscriber information service and to resell telephone credit.

### **1.3 Description of the services**

The services offered consist of the provision of telephone information, to subscribers to fixed-line and mobile telephone services in particular, by personal assistant, text message, and other channels. The service includes connecting the Client directly to the desired number after informing the client of the cost of the call. The prices of the service may be found on the website [www.seat.it](http://www.seat.it).

### **1.4 Equality and impartiality**

In providing its services, SEAT draws inspiration from the principle of the equality of treatment of all users, without distinction by race, language, religion, gender, or political opinion.

In consideration of this fact, the internal code of conduct for operators illustrates the principle in question, and compliance with said principle is later assessed during the analysis of the contents of any complaints.

SEAT's activity is shaped by the criteria of objectivity, justice and impartiality, which also underlie the interpretation of the general and specific clauses governing the provision of services and the applicable industry regulations.

### **1.5 Continuity**

SEAT guarantees that its services are provided in a regular, continuous, and uninterrupted manner, except in cases of necessary maintenance work or events of *force majeure*. In such cases, the Company undertakes to implement all measures required to reduce any inconvenience experienced by its clients to a minimum.

### **1.6 Participation**

SEAT guarantees complete availability in its relations with its clients and invites them to take a pro-active role, both individually and through consumers' associations, in order to submit their observations, proposals, and suggestions for improving the service and relationship.

Submissions may be sent to the following address and telephone number:

URL: SEAT- Casella Postale 700 10 121 Turin - Italy;

Phone number 800.00.12.56.

SEAT undertakes to provide a reply within 45 days' time.

### **1.7 Courtesy**

SEAT founds its relations with its Clients on respect and courtesy and states that its staff is available to deal with all of the Clients' needs with the utmost attention.

## **2. QUALITY STANDARDS AND TOOLS**

### **2.1 Quality standards**

SEAT conducts ongoing assessments and reviews of its services in order to ensure constant improvement of its quality standards.

### 2.1.1 Goals

SEAT undertakes to provide all the information contained in the databases it manages. In conducting its activities, it refers to the following parameters established to ensure the quality of the service provided.

Continuity of service. The service is operational 24 hours a day, 365 days a year (except in cases of *force majeure* or reasons beyond the Company's control). Any extraordinary work that requires the closure of the service will be scheduled during a time of day in which the number of calls is limited (night) and with advance notice of at least seven days.

Network efficiency rate. SEAT uses a special computer tool to measure the number of transactions not successfully concluded due to the interruption of the line between the Exchange and Telephone Stations.

Response times for the list consultation service. SEAT relies on its surveys to ensure:

- an average response time for incoming calls: 20 seconds;
- a percentage of incoming calls for which the response times are under 20 seconds: 80%.

Maximum number of annual complaints. SEAT undertakes not to exceed the maximum annual number of complaints of 10% of the calls handled through its services.

## 2.2 INVESTIGATION AND EVALUATION OF THE QUALITY OF SERVICE

SEAT subjects its qualitative results to regular analysis according to the requirements of applicable legislation. In particular, it undertakes to monitor response times, the annual number of complaints, and the time required to handle such complaints on a periodic basis. Such indicators are published annually and transmitted to the competent authorities.

## 2.3 COMMUNICATIONS WITH CLIENTS

SEAT undertakes to ensure that the conditions of interaction between the Company and its clients are simple and timely and guarantees full and clear disclosure of economic conditions (prices and billing units), the conditions of the provision of service, and any maintenance work that requires complete suspension of service (which, as mentioned above, is always carried out at night and with an advance notice of 7 days), by means of mass communications media, telephone lines, and the website [www.seat.it](http://www.seat.it). The Company further undertakes to inform its Clients of any changes to the technical conditions of access to the service and the associated economic conditions in a timely manner.

## 3. CLIENT SAFEGUARDS

### 3.1 Complaints procedure

Clients are entitled to submit any complaints regarding the malfunctioning or inefficiency of the service and breaches of the principles set forth in this Charter to the following address: SEAT- Casella Postale 700 10 121 Turin, Italy; telephone number: 800.00.12.56.

When submitting a complaint, the Client must provide all the information indispensable to identifying the petition: personal details, the telephone number from which the call was made, the operator's name, the type of notice/complaint,

and authorisation to process personal data. The data associated with the complaint are entered into the system by the operator and fed into a file that is stored in both electronic and paper form.

Within the maximum limit of 45 days from receipt of the complaint, the Company informs the client of the outcome of its inquiries and undertakes to indicate the schedule and conditions of the elimination of the reported irregularities by calling the client to resolve the dispute; if this resolution is rejected, the response is provided in written form with an indication of the reasons and the reviews performed. The operator makes a note of said outcome on the appropriate complaint file. On this topic, SEAT refers to Communications Guarantee Authority Resolution 182/02/CONS.

### **3.2. Guarantees provided to the Client**

SEAT undertakes to:

- ensure the capacity, reliability, training and experience of its operators in the field of the processing of personal data.
- comply with applicable legislation in the area of the processing of personal data. In particular, when personal data is handled, as is generally the case when complaints by users of the subscription information service are processed, the interested parties may exercise their right to access said data under the conditions set forth in article 9 of the Personal Data Protection Code, addressing their requests to the Data Processor at the Company's registered office, as identified in paragraph 3.1 above.

### **3.3 Protection of minors**

When offering services with a surcharge, the Company provides its clients with a transparent indication of services with sensitive content or content that might prove detrimental to the mental or moral wellbeing of minors, represent a direct or indirect threat to their safety and growth, or lead them into error by ambiguity or the exploitation of their natural credulousness.

The Company has configured its systems so as not to permit calls to be forwarded (call completion) by its Directory Assistance service to toll numbers for services that could offer sensitive content, such as chat lines and fortune tellers, etc., which are currently identifiable by the access code 144XY-165-XY-899XY.

The Company has already implemented an internal code of conduct and provides ample information thereon to its call centre operators in order to explicitly identify the presence of a minor on the telephone. When a positive response is given, or no response is provided, the operator explicitly advises that the service is a paid one and requests contact with an adult, if available. If a negative response is then provided, or no response is given, the call is automatically ended.