

OUR PRIVACY POLICY

We would like to thank you for your interest in our company. The protection of your data is of primary importance to our management team.

It is, in principle, possible to use the TROX GROUP websites without providing any personal data. However, if a data subject wishes to make use of particular services provided by our company by means of our website, it may be necessary to process personal data. Where it is necessary to process personal data and there is no legal basis for such processing, we will generally obtain the consent of the data subject.

Personal data of a data subject, such as name, address, email address or telephone number, are processed in compliance with the requirements of the General Data Protection Regulation and in accordance with the national data protection regulations that apply to the TROX GROUP in relation to data protection. The purpose of this Privacy Policy is to provide the public with information as to the nature, scope and purpose of the personal data processed by our company. This Privacy Policy additionally clarifies the rights appertaining to data subjects.

The TROX GROUP, as controller, has put in place a number of technical and organisational measures in order to ensure that the personal data processed via this website are provided with end-to-end protection as far as this is possible. Nevertheless, transmission of data via the Internet can exhibit fundamental security gaps, for which reason it is not possible to guarantee absolute protection. Data subjects are therefore also welcome to communicate personal data to us using alternative means, for example by telephone.

1 Definition of terms

The TROX GROUP's Privacy Policy is based on the terminology used by the European regulatory authorities in enacting the General Data Protection Regulation (GDPR). We aim for our Privacy Policy to be easy to read and understand, both for the public and for our customers and business partners. To ensure this, we would first like to explain the terminology used.

In this Privacy Policy and on our website, we use the following terms, among others:

a) Personal data

'Personal data' means any information relating to an identified or identifiable natural person (referred to as the 'data subject'). A natural person is considered to be identifiable if they can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

b) Data subject

'Data subject' means any identified or identifiable natural person whose personal data are being processed by the controller.

c) Processing

'Processing' means any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

'Restriction of processing' means the marking of stored personal data with the aim of limiting their processing in the future.

e) Profiling

'Profiling' means any form of automated processing of personal data consisting of the use of those personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

f) Pseudonymisation

'Pseudonymisation' means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g) Controller

'Controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

h) Processor

'Processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf

of the controller.

i) Recipient

'Recipient' means a natural or legal person, public authority, agency or other body to which personal data are disclosed, regardless of whether they are a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.

j) Third party

'Third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process the personal data.

k) Consent

'Consent' means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by some other clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2 Name and address of the controller

In the context of the General Data Protection Regulation, other data protection legislation in force in the Member States of the European Union and other provisions relating to data protection, the controller is:

TROX Italia S.p.A.

Via Mecenate 90

20138 Milano

ITALY

Website: www.trox.it

3 Name and address of the Data Protection Officer

The controller's Data Protection Officer is:

Elena Fumasi

TROX Italia S.p.A.

Via Mecenate 90

20138 Milano

ITALY

Data subjects can contact our Data Protection Officer directly at any time with any questions or comments about data protection.

Email: trox@trox.it

4 Cookies

The TROX GROUP websites use cookies. Cookies are text files that are stored on a computer system by means of a web browser.

A large number of websites and servers use cookies. Many cookies have a 'cookie ID'. This is a unique identifier for the cookie. It is made up of a series of characters by means of which websites and servers can be associated with the specific web browser in which the cookie has been stored. This makes it possible for the websites and services visited to distinguish the individual browser of the data subject from other web browsers containing other cookies. A particular web browser can be recognised and identified by means of the unique cookie ID.

The TROX GROUP uses cookies to provide users of this website with more user-friendly services that would not be possible without setting cookies.

A cookie can be used to optimise the information and offerings on our website for the benefit of the user. As already mentioned, cookies enable us to recognise users of our website. The purpose of this recognition is to make it easier for users to use our website. The user of a website that uses cookies does not need to re-enter his or her login data every time they visit the website, for example, because this is handled by the website and the cookie stored on the user's computer system.

The data subject can prevent cookies from being set by our website at any time using the corresponding setting in the web browser used, thereby permanently rejecting the setting of cookies. In addition, cookies that have already been set can be deleted at any time using a web browser or other software programs. This is an option in all current web browsers. If the data subject deactivates the setting of cookies in the web browser used, it may not be possible to make full use of all functions of our website in some circumstances.

5 Recording of general data and information

Every time the TROX GROUP website is retrieved by a data subject or automated system, the website records a set of general data and information. These general data and information are stored in the server log file. The following information can be recorded: (1) the browser types and versions used; (2) the operating system used by the accessing system; (3) the website from which an accessing system arrived at our website (known as the 'referrer'); (4) the web pages visited on our website by an accessing system; (5) the date and time of access to the website; (6) an Internet Protocol address (IP address); (7) the Internet service provider of the accessing system; and (8) other similar data and information that can be used to protect against threats in the event of attacks on our IT systems.

These general data and information are not used by the TROX GROUP to arrive at any conclusions regarding the data subject. Rather, this information is used (1) to deliver the contents of our website correctly; (2) to optimise the contents of our website and our advertising of it; (3) to ensure the continuous functional capacity of our IT systems and the technology for our website; and (4) to provide the prosecuting authorities with the information necessary for prosecution in the event of a cyberattack. These anonymously collected data and information are therefore evaluated statistically by the TROX GROUP, firstly, and are further evaluated with the aim of improving data protection and data security within our company so as ultimately to ensure the best level of protection for the personal data processed by us. The anonymous data from the server log files are stored separately from all personal data provided by a data subject.

6 Registration

The data subject has the option of registering on the website of the controller by providing personal data. Which personal data are transmitted to the controller during that process is determined by the form which is used for registration. The personal data input by the data subject are collected and stored solely for internal use by the controller for its own purposes. The controller may arrange for transfer of the personal data to one or more processors, for example a provider of parcel services, who will likewise use the personal data solely for the internal purposes of the controller.

By registering on the website of the controller, the IP address assigned by the data subject's Internet service provider (ISP), the date and the time of registration will furthermore be stored. These data are stored in consideration of the fact that this is the only way to prevent misuse of our services; if necessary, these data also make it possible to resolve copyright infringements and crimes that have been committed. It is therefore necessary to store these data as a safeguard for the controller. These data will never be transferred to third parties unless there is a legal obligation to do so or such transfer is for purposes of prosecution.

The registration of the data subject, with voluntary provision of personal data, allows the controller to offer the data subject contents or services which, owing to their nature, can only be offered to registered users. In addition, registration of the data subject can be used to monitor use of the copyrighted text published by us, to check links and author credits, and for our own documentation purposes. Registered individuals are free to have the personal data provided at registration erased completely from the controller's database.

The controller will provide the data subject with information as to the personal data stored in relation to the data subject at any time on request. Furthermore, the controller will rectify or erase personal data on request or notice from the data subject, provided this does not contravene any legal obligation to preserve records. The data subject is welcome to contact the Data Protection Officer named in this Privacy Policy or any of the controller's employees with regard to this matter.

7 Routine erasure and blocking of personal data

The controller processes and stores personal data relating to the data subject only for the period required to achieve the purpose of said storage or to the extent that this has been envisaged by the European regulatory authorities or another legislator under laws or regulations to which the controller is subject.

If the storage purpose no longer applies, or a storage period specified by the European regulatory authorities or another appropriate legislator expires, the personal data are blocked or erased as a routine matter in accordance with the legal provisions.

8 Rights of the data subject

a) Right of access

The data subject has the right, granted by the European regulatory authorities, to request confirmation from the controller as to whether personal data concerning him or her are being processed. If a data subject wishes to make use of this right of access, he or she can contact our Data Protection Officer or any of the controller's employees at any time.

b) Right to information

Any individual who is subject to the processing of personal data has the right, granted by the European regulatory authorities, to obtain from the controller information as to the personal data stored about him or her and a copy of that information, free of charge at any time. The European regulatory authorities have furthermore determined that the data subject is entitled to the following information:

- the purpose of the processing
- the categories of personal data being processed
- the recipients or categories of recipients to whom the personal data have been disclosed or are to be disclosed, in particular in the case of recipients in third countries or international organisations
- if possible, the planned period for which the personal data will be stored or, if that is not possible, the criteria used to determine that period

- the existence of the right to rectification or erasure of personal data relating to the data subject or for restriction of processing by the controller or a right to object to that processing
- the existence of a right to lodge a complaint with a supervisory authority
- where the personal data have not been obtained from the data subject: all available information as to the source of the data
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The data subject furthermore has a right to information as to whether personal data have been transferred to a third country or an international organisation. Where this is the case, the data subject additionally has the right to obtain information as to the suitable safeguards relating to said transfer.

If a data subject wishes to make use of this right to information, he or she can contact our Data Protection Officer or any of the controller's employees at any time.

c) Right to rectification

Any individual who is subject to the processing of personal data has the right, granted by the European regulatory authorities, to request the rectification, without undue delay, of incorrect personal data concerning him or her. The data subject furthermore has the right, taking into account the purposes of the processing, to request that incomplete personal data are completed, including by means of providing a supplementary statement.

If a data subject wishes to make use of this right to rectification, he or she can contact our Data Protection Officer or any of the controller's employees at any time.

d) Right to erasure ('right to be forgotten')

Any individual who is subject to the processing of personal data has the right, granted by the European regulatory authorities, to request the controller to erase personal data concerning him or her without undue delay, where one of the following grounds applies and provided the processing is not required:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws the consent on which the processing was based according to point (a) of Article 6(1), or point (a) of Article 9 (2) of the GDPR, and where there is no other legal ground for the processing;
- The data subject objects to the processing pursuant to Article 21 (1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21 (2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

Where one of the above grounds applies and a data subject wishes to arrange for erasure of personal data stored by the TROX GROUP, he or she can contact our Data Protection Officer or any of the controller's employees at any time. The Data Protection Officer of the TROX GROUP or another employee will arrange for the erasure request to be executed without undue delay.

Where the TROX GROUP has made the personal data public and our company, as controller, is obliged pursuant to Article 17(1) of the GDPR to erase the personal data, the TROX GROUP, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copies or replications of, those personal data, provided the processing is not required. The Data Protection Officer of the TROX GROUP or another employee will arrange for the necessary action in individual cases.

e) Right to restriction of processing

Any individual who is subject to the processing of personal data has the right, granted by the European regulatory authorities, to request from the controller restriction of processing where one of the following conditions applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of the use of the personal data instead;
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR and it is not yet verified whether the legitimate grounds of the controller override those of the data subject.

Where one of the above requirements applies and a data subject wishes to request restriction of personal data stored by the TROX GROUP, he or she can contact our Data Protection Officer or any of the controller's employees at any time. The Data Protection Officer of the TROX GROUP will arrange for the restriction of processing.

f) Right to data portability

Any individual who is subject to the processing of personal data has the right, granted by the European regulatory authorities, to receive the personal data concerning him or her, which the data subject has provided to a controller, in a structured, commonly used and machine-readable format. He or she furthermore has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR or on a contract pursuant to point (b) of Article 6(1) of the GDPR and the processing is carried out by automated means, provided that the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The data subject furthermore has the right, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, to have the personal data transmitted directly from one controller to another, where technically feasible and where this does not adversely affect the rights and freedoms of others.

The data subject can contact the Data Protection Officer appointed by the TROX GROUP or another employee at any time to assert the right to data portability.

g) Right to object

Any individual who is subject to the processing of personal data has the right, granted by the European regulatory authorities, to object at any time, on grounds relating to his or her particular situation, to processing of personal data concerning him or her which is based on points (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on those provisions.

In the event of such objection, the TROX GROUP will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or the processing serves for the establishment, exercise or defence of legal claims.

Where the TROX GROUP processes personal data for direct marketing purposes, the data subject has the right to object at any time to processing of personal data for the purposes of this kind of marketing. This also includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to the TROX GROUP carrying out processing for direct marketing purposes, the TROX GROUP will no longer process the personal data for such purposes.

Where personal data are processed by the TROX GROUP for scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of the GDPR, the data subject, on grounds relating to his or her particular situation, additionally has the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

The data subject can contact the Data Protection Officer of the TROX GROUP or another employee directly to exercise the right to object. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject is furthermore entitled to exercise his or her right to object by automated means using technical specifications.

h) Automated individual decision-making, including profiling

Any individual who is subject to the processing of personal data has the right, granted by the European regulatory authorities, not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her unless the decision (1) is necessary for entering into, or performance of, a contract between the data subject and the controller, or (2) is authorised by Union or Member State law to which the controller is subject and which law also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or performance of, a contract between the data subject and the controller, or (2) is based on the data subject's explicit consent, the TROX GROUP will take suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, which includes at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

If the data subject wishes to assert rights relating to automated decision-making, he or she can contact our Data Protection Officer or any of the controller's employees at any time.

i) Right to withdraw consent under data protection legislation

Any individual who is subject to the processing of personal data has the right, granted by the European regulatory authorities, to withdraw consent to the processing of personal data at any time.

j) Right to complain to the supervisory authority (s)

If the data subject wishes to assert his or her right to withdraw consent, he or she can contact our Data Protection Officer or any of the controller's employees at any time.

9 Data protection for job applications and during the application procedure

The controller collects and processes personal data from applicants for the purposes of the application procedure. This processing can also take place using electronic means. This is especially the case where an applicant transmits corresponding application documents to the controller via electronic means, such as by email. If the controller enters into an employment contract with an applicant, the transmitted data are stored, in compliance with the legal provisions, for the purposes of the employment relationship. If the controller does not enter into an employment contract with the applicant, the application documents are automatically erased six months after notification of the rejection decision, provided such erasure

does not contravene any other legitimate interests of the controller. In this context, 'other legitimate interests' means, for example, providing a burden of proof in a process under the German General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz, AGG).

10 Data protection provisions relating to the use of Google Analytics (with anonymisation function)

The controller has integrated Google Analytics (with anonymisation function) into this website. Google Analytics is a web analytics service. 'Web analytics' is the collection, compilation and evaluation of data relating to the behaviour of visitors to websites. A web analytics service records data including the website from which a data subject arrived at a given website (known as the 'referrer'), which web pages on the website were accessed, or how often and for how long a web page was viewed. Web analytics is predominantly used for website optimisation and for cost-benefit analysis of online advertising.

The operating company of Google Analytics is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The controller uses the extension "_gat._anonymizeIp" for web analytics using Google Analytics. This extension truncates and anonymises the IP address of the data subject's Internet connection if access to our websites originates from a Member State of the European Union or another country which is a party to the Agreement on the European Economic Area.

The purpose of Google Analytics is to analyse the flow of visitors to our website. Google uses the data and information obtained for purposes including to evaluate use of our website, to create online reports for us which illustrate activities on our websites, and to provide other services relating to the use of our website.

Google Analytics sets a cookie on the data subject's IT systems. Cookies have been defined above. Setting the cookie makes it possible for Google to analyse the use of our website. Every time a web page of this website is retrieved that is operated by the controller and into which Google Analytics is integrated, the web browser on the data subject's IT system is automatically prompted by the Google Analytics component to transmit data to Google for the purposes of online analytics. During that technical process, Google acquires personal data, such as the data subject's IP address, which make it possible for Google to trace the origin of the visitor and his or her clicks and, consequently, calculate commission.

The cookie stores personal information, such as time of access, location from which access is made, and frequency of visits to our website by the data subject. Each time our websites are visited, those personal data, including the IP address of the Internet connection used by the data subject, are transmitted to Google in the United States. Those personal data are stored by Google in the United States. In certain circumstances, Google may pass those personal data collected by means of the technical process to third parties.

As described above, the data subject can prevent cookies from being set by our website at any time using the corresponding setting in the web browser used, thereby permanently rejecting the setting of cookies. Making this setting in the web browser used would also prevent Google from setting a cookie on the data subject's IT system. Furthermore, a cookie that has already been set by Google Analytics can be deleted at any time using the web browser or other software programs.

The data subject additionally has the option to object to collection of the data generated by Google Analytics relating to use of this website and to processing of those data by Google and to prevent such collection and processing. To do this, the data subject must download and install a browser add-on from <https://tools.google.com/dlpage/gaoptout>. This browser add-on uses JavaScript to notify Google Analytics that no data or information relating to visits to websites may be transmitted to Google Analytics. The installation of the browser add-on is classified by Google as an objection. If the data subject's IT system is deleted, formatted or reinstalled at a later date, the data subject must reinstall the browser add-on in order to deactivate Google Analytics. If the browser add-on is uninstalled or deactivated by the data subject or another person under his or her authority, it is possible to reinstall or reactivate the browser add-on.

For more information and Google's current privacy policy, visit <https://policies.google.com/privacy/> and <https://www.google.com/analytics/terms/gb.html>. More information about Google Analytics can be found at <https://www.google.com/analytics/>.

11 Data protection provisions relating to the use of Google AdWords

The controller has integrated Google AdWords into this website. Google AdWords is an online advertising service that makes it possible for advertisers to place adverts both in Google search engine results and in the Google ad network. Google AdWords enables advertisers to define keywords in advance which are then used to display an advert in the Google search engine results only if the user uses the search engine to retrieve a search result that is relevant to the keyword. In the Google ad network, the adverts are allocated to websites covering relevant topics by means of an automated algorithm and observing the predefined keywords.

The operating company for Google AdWords services is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The purpose of Google AdWords is to advertise our website by showing adverts that are of interest on the websites of third-party companies and in search engine results returned by Google, and to show third-party adverts on our website.

If a data subject arrives at our website via a Google advert, Google places a 'conversion cookie' on the data subject's IT system. Cookies have been defined above. A conversion cookie becomes invalid after thirty days, and is not used to identify the data subject. Provided it has not expired, the conversion cookie is used to track whether certain webpages, such as the basket of an online shopping system, have been retrieved on our website. Both we and Google can use the conversion cookie to track whether a data subject who has arrived at our website via an AdWords advert has generated a sale, i.e. has completed or cancelled a purchase.

The data and information collected through the use of the conversion cookie are used by Google to create visitor statistics for

our website. These visitor statistics are in turn used by us to determine the total number of users transferred to us via AdWords adverts, i.e. to determine the success or otherwise of the respective AdWords advert and to optimise our AdWords adverts for the future. Neither our company nor other advertising customers of Google AdWords receive information from Google by means of which the data subject could be identified.

The conversion cookie stores personal information, for example the websites visited by the data subject. Each time our websites are visited, personal data, including the IP address of the Internet connection used by the data subject, are accordingly transmitted to Google in the United States. Those personal data are stored by Google in the United States. In certain circumstances, Google may pass those personal data collected by means of the technical process to third parties.

As described above, the data subject can prevent cookies from being set by our website at any time using the corresponding setting in the web browser used, thereby permanently rejecting the setting of cookies. Making this setting in the web browser used would also prevent Google from setting a conversion cookie on the data subject's IT system. Furthermore, a cookie that has already been set by Google AdWords can be deleted at any time using the web browser or other software programs.

The data subject additionally has the option to object to advertising from Google that relates to his or her interests. To do this, the data subject must follow the link <https://adssettings.google.com/> from each web browser used and make the appropriate settings there.

For more information and Google's current privacy policy, visit <https://policies.google.com/privacy/>.

12 Social Media Plug-ins

Several pages of the TROX GROUP website have social media plug-ins from Facebook, Twitter, LinkedIn, Xing, Google+ and YouTube as well as links to these social networks. The social media plug-ins and links can be identified via their respective network icons.

When calling up a social media network via a plug-in or link, a direct connection is created with the server of the social media provider. Facebook, Instagram, LinkedIn, Xing, Google+ and YouTube record the respective Internet page from which their services were accessed. If a user of the TROX website is registered with one of these providers and is logged on at this time, the call-up of the Internet site can be associated with his/her user account.

The social media providers Facebook, Instagram, LinkedIn, Xing, Google+ and YouTube do not provide any information about which specific information is recorded during the use of their plug-ins. TROX therefore has no information on the content, scope or the use of the data acquired by Facebook, Instagram LinkedIn, Google+ and YouTube Further information on this can be found in the data protection policy of the social media providers.

The data protection policy of the social media networks used by TROX can be found at the following links:

[Facebook](#)
[LinkedIn](#)
[Instagram](#)
[Xing](#)
[Google+](#)
[Youtube](#)

Users who do not want to authorise the collection by a social media provider of personal data on the Internet pages of the TROX Group can deactivate the plug-ins in their browser. To prevent a connection being created to an existing user account, users must log out before visiting the TROX website.

TROX Italia S.p.A.

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Società unipersonale soggetta a direzione e coordinamento di TROX GmbH

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TROX NEI SOCIAL WEB
