

## **Privacy Statement**

**pursuant to Article 13 of Italian Legislative Decree 196/2003 - Personal Data Protection Code**

In accordance with Article 13 of Italian Legislative Decree 196 of 30 June 2003 and of the General Data Protection Regulation (GDPR) no. 679/2016, **SAPI MED SPA**, registered office at Via della Chimica 6, 15121 Alessandria, Italy, in quality of Data Controller, guarantees, within the scope of statutory provisions, that all personal data will be processed with full respect for the fundamental rights and freedoms and the dignity of the data subject, in particular as concerns the confidentiality, the personal identity, the rights and the protection of the personal data. Accordingly, **SAPI MED SPA** has provided this privacy statement to inform you of the purposes for which personal data is collected and how it is processed, the scope for its disclosure and publication, and consent requirements.

### **PURPOSES OF PROCESSING**

All personal data provided, including any images sent by you, will be processed and will be considered freely given by you, **SAPI MED SPA** does not possess any illicit means of obtaining such information.

Personal data provided for the supply of goods and/or services will be processed solely for the purposes of fulfilling contractual obligations and satisfying your specific requests, or to comply with statutory requirements of an administrative, accounting and tax nature, and to enable the effective management of professional, financial and business dealings. Your personal data will be processed for the full duration of the contractual arrangement, and after its termination solely for compliance with statutory requirements and for administrative and business purposes.

The legal basis of the processing is the existing contractual or pre-contractual relation between the parties.

### **MANDATORY AND OPTIONAL PROVISION OF DATA AND THE CONSEQUENCES OF REFUSAL**

The provision of personal data for processing by **SAPI MED SPA** is optional. Nevertheless, the provision of the data is necessary for the purposes stated in point above. Any refusal to provide the data, or the provision of partial or inaccurate or no data, will make it impossible to fulfil and perform, in part or in whole, the stated purposes of processing.

Nevertheless, your consent is required for data processing, as explained in the relative section of this privacy statement.

### **HOW DATA IS PROCESSED**

Personal data will be processed both manually, in paper format, and using electronic means. Electronic processing is based on the proprietary systems and databases of the Data Controller and involves appropriate computerised procedures for the storage, management and transmission of data, using methods and logics designed to guarantee the security and confidentiality of the data.

**SAPI MED SPA** guarantees that it will only process data that is pertinent, complete and not excessive in relation to the purposes for which they were collected; it is your responsibility as the data subject to notify us promptly of any corrections, additions and/or changes to the data. Specific security measures are in place to prevent data loss, misuse or incorrect use, and any unauthorised access.

### **RETENTION PERIODS**

Personal data will be processed for the time necessary to satisfy the stated purposes for which they were collected and to fulfil contractual obligations and statutory and regulatory requirements, without prejudice to the statutory limitations and time-limits of rights and in compliance with resulting obligations. In any case no more than 10 years + 1.

### **WHO MAY ACCESS THE DATA**

Personal data will be processed, within the limits of the general authorisations issued by the Data Protection Authority, by data processors expressly and specifically designated for the purpose by the Data Controller. Personal data may also be processed by outsourcers engaged to provide services connected with the purposes of processing and which our organisation may designate, from time to time, as data processors in charge of the data processing operations they perform, to ensure greater protection. All data processors will process personal data in compliance with the instructions provided by the Data Controller, according to the operating profiles assigned to them on the basis of the duties they perform, as necessary and relevant to perform specific tasks within the scope of the services requested, and exclusively for the purposes stated in this privacy statement.

The list of data processors in charge of processing is constantly updated and can be obtained by written request, as explained further on in the section on the rights of the data subject.

### **DISCLOSURE AND PUBLICATION**

Personal data may be disclosed, meaning that the information may be provided to certain entities, other than the Data Controller, by data processors in charge of data processing, both internal and external to the organisation, and by data processors designated and tasked for the purpose in accordance with Articles 29 and 30 of the Personal Data Protection Code to pursue the stated purposes of processing, and within the limits of those purposes, in the following cases:

- to public or private entities duly entitled to access the data under laws, regulations or European Union legislation, within the limits they provide;
- to external entities engaged to perform activities on behalf of **SAPI MED SPA** in relation to data processing and which, to ensure greater protection, our organisation may designate, from time to time, as data processors in charge of the data processing operations they perform or may require to accept specific clauses requiring the duty of confidentiality and data protection and compliance with the Personal Data Protection Code, including amendments and additions;
  - companies which perform, on our behalf, IT and computer services, financial, administration and archiving services, printing and envelope inserting, and mail sorting and delivery to customers;
- external consultants engaged by **SAPI MED SPA**, as necessary to perform their assignment at our organisation, subject to their acceptance of specific clauses requiring the duty of confidentiality and data protection and compliance with the Personal Data Protection Code, including amendments and additions.

Personal data, where collected and strictly for the purposes stated above, may be transferred to partner organisations of **SAPI MED SPA** in other countries, including countries outside the European Union, in accordance with the Personal Data Protection Code. In particular, the transfer will be made only in the presence of a EU Commission's decision adequacy or only in the presence of express reference to appropriate guarantees or of the means to obtain a copy of such data or the place where they have been made available.

Where such transfers cannot be made without the free and express consent of the data subject, either because they are otherwise not permitted by law or they do not relate to the stated purposes of processing, your consent as the data subject will be required to transfer the data to entities that perform services ancillary to the stated purposes of processing.

Personal data will not be published, meaning that the information will not be disseminated in any way, either by being made public or available for consultation, unless you specifically give your free and informed consent for each type of processing.

### **RIGHTS OF THE DATA SUBJECT**

Data subjects may exercise their rights of the Personal Data Protection Code (Right to Access Personal Data and Other Rights) in relation to the data referring to them at any time. In particular, you have the right to obtain confirmation as to whether or not your personal data are being processed; the right to access the data and obtain information as to the source of the data; the right to verify the accuracy of the data; and the right to have the data supplemented or updated. You may request the rectification or blocking of your personal data if they are incomplete or inaccurate or were collected in violation of laws in force. Similarly, you may also object to the processing of your personal data on legitimate grounds or to any automated decisional process (including profiling) and may request, on those same grounds, their erasure, providing it is in accordance with laws in force and where the Data Controller is not subject to other data storage or processing obligations.

Data subjects have also the right to object to the processing of their personal data for marketing purposes (where made), even if made with automated contact modes; such right is extended also to traditional modes and the interested parties can entirely or partially exercise such rights (i.e. only to text message, email or telephone communications meaning to objecting only to promotional communications made by automated means).

You can exercise your rights or obtain an updated list of data processors by request, by writing to **SAPI MED SPA**, by ordinary post or by e-mail at the address [info@sapimed.com](mailto:info@sapimed.com), or by writing to the data processor directly, available at the Data Controller's registered office, via the e-mail address provided, to obtain a prompt response.

Whenever data subject has given consent to the data processing for a specific purpose, the same will always have the right to revoke it in any moment without undermining the lawfulness of the processing based on the consent given before the revocation.

It is also recalled that the data subject has always the right to bring a complaint to the Data Protection Authority for the exercise of the rights or for any other matter related to the its personal data processing.

### **DATA CONTROLLER**

The Data Controller for the processing of personal data is **SAPI MED SPA**, registered office at Via della Chimica 6, 15121 Alessandria, ITALY.

The Controller keeps an updated list of the Processors and guarantees their examination to the person concerned at the offices above indicated.

### **CONSENT**

In accordance with the Personal Data Protection Code, we inform you that:

- express consent is not required for the processing of personal data provided by you for the proper handling of contractual arrangements, given that the data is common personal information and necessary for the fulfilment of statutory requirements.

The Data Controller  


To be published on a dedicated page of the website