

COOKIES: INFORMATION REGARDING PERSONAL DATA PROTECTION
IN ACCORDANCE WITH ART. 13 OF (EU) REGULATION 2016/679

Pursuant to art. 13 of (EU) Regulation 2016/679, SAPI MED SPA located in Via della CHIMICA No.6 - Alessandria, acting as Holder of the Processing Data, informs visitors to the website www.sapimed.com of the type of cookies the website uses and the purposes pursued with the information acquired, also providing indications on how to select/deselect individual cookies.

WHAT ARE COOKIES AND FOR WHAT PURPOSES CAN THEY BE USED

A "cookie" is a small text file created by some websites on the computer of the user when accessing a specific website, with the purpose of storing and carrying information. Cookies are sent from a web server (which is the computer on which the website is being visited) to the user's browser (Internet Explorer, Mozilla Firefox, Google Chrome, etc.) and stored on the user's computer; they are then resent to the website upon subsequent visits.

Some operations cannot be carried out without the use of cookies; therefore, in some cases, they are technically necessary. In other cases, the website uses cookies to facilitate navigation on behalf of the user or to allow them to use the services which are specifically required.

Cookies can stay in the system even for long periods of time and can contain a unique ID code. This allows the websites that use them to keep track of the navigation of the user on the website for statistical or advertising purposes, to create a personalised user profile starting from the pages he or she has visited and to show and/or send targeted advertisement.

Here are the details of the cookies adopted:

COOKIES	NAME	PURPOSE	TYPE	DURATION	Description
<u>Google Analytics</u>	<i>__utma</i>	technical	of third parties	2 years from set/update	Used to distinguish users and sessions. This cookie is created when the JavaScript library is executed and there is no __utma cookie. This cookie is updated every time data is sent to Google Analytics.
<u>Google Analytics</u>	<i>__utmb</i>	technical	of third parties	30 minutes from set/update	It is used to establish of new sessions/visits. This cookie is created when the JavaScript library is executed and there is no __utmb cookie. This cookie is updated every time data is sent to Google Analytics.

<u>Google Analytics</u>	<code>__utmc</code>	technical	of third parties	Session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie is used together with cookie <code>__utmb</code> to establish whether the user is in a new session / call.
<u>Google Analytics</u>	<code>__utmt</code>	technical	of third parties	10 minutes	Used to increase the request speed
<u>Google Analytics</u>	<code>__utmz</code>	technical	of third parties	6 months from set/update	Stores the source of traffic or of the campaign which explains how the user has reached the website. The cookie is created when the javascript library is executed and is updated every time the data is sent to Google Analytics.
<u>Website</u>	<i>Sapi-Med_close_Alert</i>	technical	of first parties	1 month	

THIRD PARTY COOKIES

On this website, third-party cookies are operational, that is to say cookies created by a different website to the one the user is currently visiting.

For more information, refer to the policy cookies of these third-parties by following the instructions given clearly in the follow-up to this document.

Given the objective complexity connected to identifying cookie-based technologies and their integration which is strictly tied to the functioning of applications and the web, the user is encouraged to contact the Holder if he wishes to receive any details pertaining to the use of cookies and of any uses made on behalf of third parties via this website.

We specifically inform users that the web analysis service used by the Holder that releases cookies is "Google Analytics".

To consult the privacy document of Google pertaining to Google Analytics, or to express your consent pertaining to the use of these cookies, please visit the website <http://www.google.com/intl/it/analytics/privacyoverview.html>

PROCESSING METHOD

The data processing is carried out via IT procedures or electronic procedures on behalf of individuals authorised by the holder and specifically instructed to guarantee the respect and protection of the personal data processed.

In terms of preservation, the Holder commits to adopting all the appropriate safety measures as set forth by the regulation.

DESELECTING AND ACTIVATING COOKIES

Most of the browsers (Internet Explorer, Microsoft Edge, Firefox, Chrome, Safari, etc.) are configured to accept Cookies. The cookies stored on the hard disk drive of the device can still be deleted and it is possible to disable the cookies following the indications provided by the main browsers at the following links:

Chrome

Firefox

Internet Explorer

COMMUNICATION AND DISSEMINATION, RECIPIENTS

The data collected can be shared with:

Third-party subjects appointed as external processing managers (e.g. IT assistance companies, web-marketing and tele-marketing companies, etc.)

Third-party and/or private subject and competent authorities that can access the data by law;

The data will not be disclosed, sold or exchanged to third-party subjects without the expressed consent of the interested party.

TRANSFERRING DATA ABROAD TO COUNTRIES OUTSIDE THE EUROPEAN ECONOMIC SPACE

We inform you that the processing holder currently does not transfer personal data to third party countries or to international organisations..

If it decided to transfer personal data to a third party country or to an international organisation, this transfer will only occur in the presence of an appropriacy decision of the European Commission or in the case of transfers pursuant to article 46 or 47, or article 49, paragraph two, only if there is expressed reference to the appropriate or suitable guarantees and to the means to obtain a copy of such data or the place where the data has been made available.

RIGHTS OF THE DATA SUBJECTS

The data subjects to whom the personal data refers have the right to exercise the following rights at any moment:

<u>Art. 7 – Right to warranty</u>	the data subject has the right to revoke his/her consent at any point in time. Revoking consent does not compromise the lawfulness of the treatment based on consent before the revocation. Before expressing consent, the data subject is informed of this. Consent is revoked as easily as it is given.
<u>Art. 15 - Right of Access</u>	The data subject shall have the right to obtain confirmation from the holder as to whether or not personal data concerning him/her is being processed, and, where that is the case, access to the personal data and information pertaining to the treatment.

<u>Art. 16 – Right of Rectification</u>	The data subject has the right to obtain from the holder without undue delay the rectification of inaccurate personal data concerning him/her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
<u>Art. 17 - Right to Erasure ("Right to be forgotten")</u>	The data subject shall have the right to obtain from the holder the erasure of personal data concerning him or her without undue delay and the holder shall have the obligation to erase personal data without undue delay.
<u>Art. 18 – Right to Limit the Data Processing</u>	The data subject has the right to obtain processing limitations from the processing holder in one of the following circumstances: a) the interested party refutes the exactness of the personal data for the period necessary for the processing holder to assess the exactness of said personal data; b) the processing is illegal and the interested party objects to the cancellation of personal data and instead asks that its use be limited; c) even though the processing holder no longer needs the data for processing purposes, the personal data is necessary for the data subject to assess, exercise or defend a right in a legal context; d) the data subject objects to processing in accordance with article 21, paragraph 1, while awaiting the assessment pertaining to the prevalence of the legitimate reasons of the processing holder compared to those of the data subject.
<u>Art. 21 – Right to Object</u>	The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him/her which is based on letters (e) or (f) of Article 6(1), including profiling based on those provisions.
<u>Art. 22 - Right to not be subjected to the automated decision-making process, including profiling</u>	The data subject has the right to not be subjected to a decision based solely on automated processing, including profiling, which produces legal effects which concern him/her or which impact significantly in a similar way on the person.
<u>Art. 77 – Right to make a formal complaint</u>	The data subject who believes that the processing violates the privacy regulation in force has the right to make a formal complaint to the supervisory authority.

DATA PROCESSING HOLDER

The holder is SAPI MED SPA located in Via della CHIMICA No.6 - Alessandria.

The updated list of data processing managers is available at the Holder's legal headquarters.

For every communication relating to the rights of the data subject, it is possible to contact:

info@sapimed.com

AMENDMENTS AND UPDATES

This information document can be subject to amendments and integrations, even following regulatory amendments. It will be our concern to constantly update the information.

Date of the most recent approval 29th March 2019

The Holder
(the original copy)