

**WEBSITE USERS: INFORMATION ON PERSONAL DATA PROTECTION  
PURSUANT TO ART. 13 - REGULATION (EU) 2016/679**

Pursuant to Article 13 of Regulation (EU) 2016/679, SAPI MED SPA with registered office in Via della CHIMICA N. 6 - Alessandria, in its capacity as Data Controller, hereby informs visitors to the website [www.sapimed.com](http://www.sapimed.com) as follows:

**Purposes of processing, Legal basis, Personal data processed and Retention period**

<b>Purpose</b>	<b>Personal data</b>	<b>Legal basis</b>	<b>Retention</b>
Account creation and management	First name, surname and contact details (e-mail)	Implementation of pre-contractual measures [Art. 6, 1, lett. b) GDPR]	Until the deletion of the account and no later than 24 months from the date of last contact
Contact and customer care	General data Contact data Purchase history	Implementation of pre-contractual and/or contractual measures [Art. 6, 1, lett. b) GDPR]	1 year
Management of the work with us section	General data Contact data	Implementation of pre-contractual and/or contractual measures [Art. 6, 1, lett. b) GDPR]	2 years
Newsletter	General data Contact data	Consent [Art. 6, 1, lett. a) GDPR]	Until the withdrawal of consent and no later than 24 months from the date of last contact
Fulfilment of legal obligations, including those related to taxation	General data Contact data	Legal obligation [Art. 6, 1, lett. c) GDPR]	According to applicable law
Communication of data to the sales network (for Italian customers only) Data may be sent to the sales network of SAPI MED agents for the communication of technical and commercial information	General data Contact data	Consent	Until the withdrawal of consent and no later than 24 months from the date of last contact

Assert or defend the Controller's rights	General data Contact data Data related to orders	Legitimate interest [Art. 6, 1, lett. f) GDPR]	10 years
Improvement of the website and security by analysing how Visitors or Users browse and/or use the website	IP address	Legitimate interest [Art. 6, 1, lett. f) GDPR]	Not applicable (aggregated or anonymous data)

### DATA SUPPLY

Data is supplied by accessing the website and filling in the appropriate form.

### METHOD OF PROCESSING

The data is processed by computer or using other telematic means and paper media by persons authorised by the Data Controller and specially trained to ensure the respect and protection of the personal data processed. For storage, the Data Controller guarantees the adoption of all the appropriate security measures as required by law.

### DISCLOSURE AND DISSEMINATION, ADDRESSEES

Personal data are processed by persons expressly and specifically appointed by the Data Controller as data processors or persons in charge of processing.

The data will not be disseminated, sold or exchanged with third parties without the express consent of the data subject.

The data may also be processed by third parties (outsourcers) and consultants, who we use for the provision of services related to the purpose pursued and who our organisation decides whether to appoint as data processors on a case-by-case basis, in order to ensure greater data protection.

In all cases, these subjects will process the data in accordance with the instructions received from the Data Controller, according to the operational profiles attributed to them in relation to the functions performed, limited to that necessary and instrumental to the performance of specific operations within the scope of the services requested and exclusively for the pursuit of the purposes indicated in this policy.

The list of Data Processors, which is constantly updated, can be requested by sending a communication in the manner indicated in the following point regarding the rights of the data subject.

Data may also be communicated to public and/or private third parties and competent authorities who may access the data pursuant to the law.

### DATA TRANSFER OUTSIDE THE EU

The data collected are not transferred outside Europe.

## **RIGHTS OF THE DATA SUBJECTS**

The User may exercise all the rights envisaged in articles 15-21 of the GDPR at any time and without unjustified limitation by contacting the Data Controller at the following e-mail address: [info@sapimed.com](mailto:info@sapimed.com)

Requests are filed free of charge and processed by the Controller within 30 days.

In particular, the User may:

- Obtain confirmation that processing is taking place (Art.15);
- Obtain the rectification of incorrect or incomplete data (Art. 16);
- Obtain the deletion of data without unjustified delay (Art. 17);
- Limit the processing to only part of the personal data (Art. 18);
- Receive a copy of the personal data held by the data controller, in a commonly used, machine-readable format; obtain unimpeded transfer to another data controller (Art. 20);
- Object to the processing of personal data at any time. (Art. 21);
- With regard to the purposes of processing that are based on consent, withdraw such consent at any time.

The User may always lodge a complaint with the competent Authority (Data Protection Authority), pursuant to Art. 77 of the GDPR, if they believe that the Controller is processing their Personal Data in breach of the applicable legislation.

## **DATA CONTROLLER**

The Data Controller is SAPI MED SPA with registered office in Via della Chimica 6 - Alessandria .

The updated list of data processors appointed is available at the Data Controller's registered office.

For all communication relating to the exercise of the rights of the data subject, please contact:

[info@sapimed.com](mailto:info@sapimed.com)

## **AMENDMENTS AND UPDATES**

This policy may be subject to amendments and integrations, also as a consequence of regulatory changes. We will keep this information constantly updated.

Date of last approval, 21/02/2024

The Holder  
SAPI MED SPA  
(Signed on the original version)