

NEWSLETTER : INFORMATION ON PERSONAL DATA PROTECTION

PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

Pursuant to Article 13 of Regulation (EU) 2016/679 the SAPI MED SPA company with office in Via della CHIMICA N. 6 - Alessandria, as Data Controller, informs users of internet services who are interested in subscribing to the newsletter of the following:

PROCESSED DATA

Identification and contact data

PURPOSES	LEGAL BASIS OF PROCESSING
Sending the newsletter as requested by the user, also by segmentation by type and sector of interest selected, so that the interested user can receive information and/or invitations that are targeted and relevant to them	The legal basis of processing is consent

NATURE OF PROVIDING DATA

The provision of personal data is optional. Any failure to provide data will make it impossible for the data controller to proceed with the requests of sending the newsletter.

PROCESSING METHODS

The processing of personal data will be carried out through IT procedures or telematic means and on paper by those authorized by the data controller and appropriately instructed to guarantee compliance and protection of the personal data that is processed.

The data controller guarantees the adoption of all appropriate security measures as required by law for data retention.

DATA RETENTION PERIOD

The data is retained up to the request of the data subject of any opposition or renunciation of receiving the newsletter by clicking on the unsubscribe link at the bottom of each communication.

COMMUNICATION AND DISSEMINATION, RECIPIENTS

Personal data processing will be carried out, by parties expressly and specifically appointed and authorized by the data controller.

These parties will process the data in accordance with the instructions received from the data controller, according to operational profiles assigned to them in relation to the functions performed, restricted to what is required and instrumental for the execution of specific operations within the requested services and exclusively for the achievement of the purposes indicated in this information.

The processed data may be communicated to:

Third parties appointed as external data processors. (e.g. Mailchimp)

Public and/or private third parties and competent authorities that can access the data according to law;

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

DATA TRANSFER ABROAD IN NON-EU COUNTIRES

In few cases, the collected data may be transferred outside the EU borders - such as MAILCHIMP - limited to the transmission of data on mail marketing platforms in order to optimize the sending of communications to customers or potential customers.

In any case, the transfer will take place in compliance with the provisions of the existing privacy legislation. In particular, the transfer will take place only in the presence of the adequacy decision by the European Commission or only in the presence of express reference to the appropriate or convenient guarantees and the way to obtain a copy of such data or the place where they were made available.

The data will not be disclosed, with this term meaning the disclosure to indeterminate subjects in any way, including by making them available or consulting, unless specific, free and informed consent is granted for each type of treatment.

RIGHTS OF DATA SUBJECTS

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

<u>Article 7 - Right to revoke consent</u>	The data subject shall have the right to revoke their consent at any time. The revocation of consent shall not affect the lawfulness of processing based on consent before its revocation. Prior to giving consent, the data subject shall be informed thereof. Consent is revoked as easy as it is consented.
<u>Article 15 - Right of access</u>	The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning them is being processed, and, where that is the case, obtain access to the personal data and the information regarding processing.
<u>Article 16 - Right to rectification</u>	The data subject has the right to obtain without undue delay the rectification by the controller of inaccurate personal data concerning them. Considering the purposes of the processing, the data subject has the right to have incomplete personal data completed, also by providing an additional declaration.
<u>Article 17 - Right to erasure (right to be forgotten)</u>	The data subject has the right to obtain the erasure of personal data concerning them by the data controller without undue delay and the controller has the obligation to erase personal data without undue delay

<u>Article 18 - Right to the restriction of processing</u>	<p>The data subject has the right to obtain restriction of processing by the controller where one of the following applies:</p> <ul style="list-style-type: none"> a) 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; b) the processing is unlawful and the data subject objects to the erasure of the personal data and requests the restriction of its use instead; c) despite the controller no longer needing the personal data for processing purposes, it is required by the data subject for the establishment, exercise or defence of a right in court; d) the data subject has objected to processing pursuant to Article 21, paragraph 1, pending the verification whether the legitimate grounds of the controller override those of the data subject.
<u>Article 21 - Right to object</u>	The data subject has the right to object at any time, on grounds relating to their specific situation, to the processing of personal data concerning them pursuant to Article 6, paragraph 1, letters e) or f), including profiling based on such provisions.
<u>Article 22 - Right not to be subject to an automated decision-making process, including profiling</u>	The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or has a significantly similar effect on them
<u>Article 77 - Right to lodge a complaint</u>	The data subject who considers that any processing regarding them violates the current privacy rule, has the right to lodge a complaint with a supervisory authority

DATA CONTROLLER

The data controller is the SAPI MED SPA company, with office in Via della Chimica, 6 - Alessandria

The updated list of the appointed data processors is available at the registered office of the data controller.

For any communication regarding the data subject exercising their rights, it is possible to contact:

info@sapimed.com

MODIFICATIONS AND UPDATES

This information may be subject to modifications and additions, also as a consequence to legislative modifications. We will take care of constantly updating the information.

Date of last approval, 09/03/2022

The Data Controller

SAPI MED SPA

(original signature)