

## **WEBSITE REGISTRATION: PRIVACY POLICY**

### **IN ACCORDANCE WITH ART. 13 REGULATION (EU) 2016/679**

In accordance with Art. 13 of Regulation (EU) 2016/679, the company SAPI MED SPA based in Via della Chimica no. 6 - Alessandria, in the capacity of Data Controller, hereby informs visitors to the website [www.sapimed.com](http://www.sapimed.com) of the following:

#### **DATA PROCESSED**

Common data (personal, contact, etc)

<b>PURPOSE</b>	<b>LEGAL BASIS OF PROCESSING</b>
Online registration The data will be processed to allow for registration and access to some consultation services	Spontaneous provision of data by the candidate
Provision of data to the sales network (only for Italian clients) The data may be sent to the sales network of SAPIMED agents for the communication of technical and commercial information	Consent

#### **NATURE OF PROVISION OF DATA**

The provision of data occurs by accessing the website and completing a specific form.

#### **PROCESSING METHODS**

The data are processed through IT or electronic methods and on paper by those authorised to process by the Controller who have been specifically instructed to guarantee respect and protection of the personal data processed.

For storage, the Controller guarantees that it adopts all appropriate security measures as envisaged by the legislation.

#### **DATA STORAGE PERIOD**

For the time necessary to fulfil the registration reasons or for the longer time permitted by the legislation.

#### **COMMUNICATION AND DISSEMINATION, RECIPIENTS**

The personal data will be processed by means of persons expressly and specifically designated by the Controller, in the capacity of Processors or officers.

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, which are used to provide the services related to the purposes pursued, in relation to which our organisation assesses each time - in order to guarantee greater protection - whether to appoint them as Processors for the processing implemented by them.

In all cases, those entities will process the data in accordance with instructions received from the Controller, according to the operational profiles attributed to the same based upon the functions performed, limited to what is necessary and instrumental for the execution of specific operations involved in the services requested and exclusively to achieve the purposes indicated in this privacy policy.

The list of Processors, which is constantly updated, may be requested by sending a communication by the methods indicated in the point below regarding the rights of the Data Subject.

They may also be communicated to public and/or private third parties and competent authorities that are entitled to access the data by virtue of the law.

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

## **TRANSFER OF DATA OUTSIDE THE EU**

The data collected will not be transferred outside the European borders.

## **RIGHTS OF THE DATA SUBJECTS**

The Data Subjects, to whom the personal data refer, may exercise the following rights at any time:

<u>Art. 7 - Right to withdraw consent</u>	the data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.
<u>Art. 15-Right of access</u>	The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and information regarding the processing.
<u>Art. 16 - Right to rectification</u>	The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or 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 controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay.
<u>Art. 18 - Right to restriction of processing</u>	The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies: 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 opposes the erasure of the personal data and requests the restriction of their use instead; c) 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; d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of

	the controller override 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 processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions.
<u>Art. 22 - Right not to be subjected to automated individual decision-making, including profiling</u>	The data subject shall have the right 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.
<u>Art. 77 - Right to lodge a complaint</u>	Every data subject shall have the right to lodge a complaint with a supervisory authority, if the data subject considers that the processing of personal data relating to him or her infringes the privacy regulation.

#### **DATA CONTROLLER**

The Controller is the company SAPI MED SPA based in Via della Chimica no. 6 - Alessandria.

The updated list of appointed Processors is available from the registered office of the Controller.

For any communication relating to the exercise of the rights of the Data Subject, contact:  
info@sapimed.com

#### **AMENDMENTS AND UPDATES**

This privacy policy may be amended and supplemented, even as a result of regulatory changes. We will constantly update the privacy policy.

Date of last approval, 15.02.2022

The Controller  
SAPI MED SPA  
(signed on original)