

WEBSITE USERS: 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 of the following:

DATA PROCESSED

1. Browsing data collected in an automated manner: The IT systems and software procedures in charge of the functioning of this website acquire, in their normal exercise and for the sole duration of the connection, some data which are then sent implicitly in the use of Internet communication protocols. These data are not collected to be associated with identified entities but may, by their very nature, through processing and association with data held by third parties, allow for users to be identified.
2. Data provided voluntarily by the user (name, email address, any additional data sent spontaneously by the user) to receive the various services offered in the different sections of the website. – **see specific privacy policies in the various website sections**

PURPOSE	LEGAL BASIS OF PROCESSING
Analysis Collection of data and information exclusively in aggregate and anonymous form to verify the correct functioning of the website.	Legitimate interest
Security Collection of data and information to protect the security of the website (anti-spam filters, firewalls, virus detection) and of Users and to prevent or reveal fraud or abuse to the detriment of the website.	Legitimate interest
Instrumental activities To communicate data strictly necessary to allow for the conduct of technical, logistical and other activities on our behalf.	Legitimate interest
Specific requests of the Data Subject If data is sent spontaneously by the Data	Spontaneous provision of data by the Data Subject

Subjects, they will be processed in order to fulfil the specific requests	
Accessory activities The data may be processed to exercise or defend a legal claim	Legitimate interest

NATURE OF PROVISION OF DATA

The provision of browsing data occurs by accessing the website.

The provision of data for requests for services offered by the various sections occurs by spontaneous provision of data by the Data Subject.

PROCESSING METHODS

The data are processed through IT or electronic methods and on paper by those authorised 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

The browsing data are erased after a few hours. The data relating to specific requests of the Data Subjects are stored for the time necessary for the requested services and for the accessory purposes.

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.

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:

Art. 7 - Right to <u>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)