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Information on the processing of personal data pursuant to art. 13-14 EU Reg.to 2016/679

Data Subjects: Customers

DIPRO MEDICAL DEVICES SRLin the capacity of Data Controller of your personal data or As Data Processor for the development of projects, training and coaching, marketing activities and newsletters, pursuant to and for the purposes of EU Reg.to 2016/679 (hereinafter "GDPR"), hereby informs you that the aforementioned legislation provides for the protection of data subjects regarding the processing of personal data and that this treatment will be based on principles of fairness, lawfulness, transparency and protection of your privacy and rights.

Your personal data will be processed in accordance with the legislative provisions of the above legislation and the confidentiality obligations therein.

Data Protection Officer
The Data Controller has appointed a Data Protection Officer (DPO), who can be contacted using the following detail:

- E-mail: privacy@dipromed.eu

Purpose and legal basis of the processing: in particular, your data will be processed for the following purposes related to the implementation of obligations relating to legislative or contractual obligations:

- Management of the contractual relationship with the customer, including pre- and post-contractual activities (b.g. execution of a contract art. 6 par. 1 lit. b)
- management of possible reports (b.g. legal obligation art. 6 par. 1 lett. c and treatment necessary for reasons of public interest for the guarantee of high parameters of quality and safety of medical devices art. 9 par. 2 letth)
- Statutory obligations in the tax and accounting field (b.g. legal obligation art. 6 par. 1 lit. c)
- Fulfilment of legal obligations, regulations, national and/or Community regulations (b.g. legal obligation art. 6 par. 1 lit. c)
- Soft marketing activities, sending newsletters and information communications within the services offered (b.g. legitimate interest art. 6 par. 1 lit. f)
- defensive investigation activity to ascertain, exercise or defend a right in court (b.g legitimate interest of the Data Controller art. 6 par. 2 lett. f)

The processing of data, which are functional for the fulfillment of these obligations, is necessary for the proper management of the relationship and their provision is mandatory to implement the purposes indicated above. The Data Controller also informs that any failure, or incorrect communication, of any obligatory information, may make it impossible for the Data Controller to ensure the adequacy of the processing itself.

The Data Controller informs that at any time, even together with the collection of data necessary for billing, the data subject may object to the use of his personal data (in particular contact data) for sending communications, newsletters and marketing activities within the services offered. This processing does not require the consent of the interested party, because according to art. 6 par. 1 letter f and recital 47 of the GDPR, as well as art. 130 paragraph 4 of the new Privacy Code D.Lgs. 196/2003, the legitimate interest of the Data Controller constitutes the applicable legal basis.

Processing methods: your personal data may be processed in the following ways:

- treatment by means of electronic computers
- manual processing by means of paper archives

All processing is carried out in accordance with the procedures established in Articles. 6, 32 of the GDPR and through the adoption of the appropriate security measures provided.

Communication: your data may be disclosed only to public authority and offices to which the fiscal data must be communicated, as well as to banks and credit institutions; in case of necessity for the performance of the services requested, to competent and duly appointed parties for the performance of the services necessary for the proper management of the relationship, such as consultants and service providers, with a guarantee of protection of the rights of the person concerned.

Your data will be processed only by personnel expressly authorized by the Data Controller.
Dissemination: Your personal data will not be disclosed in any way.

Retention period: We inform you that, in accordance with the principles of lawfulness, purpose limitation and data minimization, pursuant to Article 5 of the GDPR, the retention period of your personal data is:

- **fiscal and accounting data**: 10 years in compliance with the obligations relating to the conservation of accounting and tax records (art. 2220 of the Codice Civile which provides for the conservation for 10 years of accounting records; art. 22 of D.P.R. 29 September 1973, n.600)
- **other data**: 10 years from the moment of termination of the contract or, in the event of disputes, for the limitation period provided for by the legislation for the protection of related rights

Rights of the data subject

1. The data subject has the right to obtain confirmation of the existence or not of personal data concerning him, even if not yet registered, and their communication in an intelligible form.

2. The data subject has the right to obtain information about:
   a. the origin of the personal data;
   b. the purposes and methods of processing;
   c. the logic applied in case of processing carried out with the aid of electronic instruments;
   d. the identification details of the owner, of the managers and of the designated representative pursuant to article 5, paragraph 2;
   e. of the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents.

3. The data subject has the right to obtain:
   a. updating, rectification or, when interested, integration of data;
   b. the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data was collected or subsequently processed;
   c. the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data has been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right;
   d. data portability.

4. The data subject has the right to object, in whole or in part:
   a. for legitimate reasons, to the processing of personal data concerning them, even if pertinent to the purpose of the collection;

5. The data subject has the right to request the limitation of the processing.

You can exercise your rights by sending an email to info@dipromed.eu or by sending a written request to the above addresses.

In addition, if the data subject considers that the processing of their data is contrary to the legislation in force, he can lodge a complaint with the Supervisory Authority for the protection of personal data pursuant to Article 77 of Regulation 2016/679.