

# Information on the processing of personal data

(Articles 13 and 14 of EU Regulation no. 679/2016 on data protection)

Rev. 0

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For the execution of relations with its users, customers and suppliers, ORMESA S.r.l. collects the Data referred to them, also acquired verbally, directly or through third parties, qualified as "Personal Data" by Legislative Decree no. 196/2003 (so-called "Privacy Code"), by the European Privacy Regulation no. 679/2016 (GDPR) and by Legislative Decree no. 101/2018 ("Provisions for the adaptation of national legislation to the provisions of EU Regulation 2016/679"). The aforementioned regulations provide that those who process Personal Data (hereinafter "Data") are required to provide the Data Subject with the following information:

#### 1. DATA CONTROLLER

ORMESA S.R.L., based in Foligno (PG), via A. Da Sangallo n. 1, Tax code 00574020541 (hereinafter the "Company").

### 2. PURPOSE OF THE DATA PROCESSING

The Data of our users, customers and suppliers are processed for:

- i. carry out the services requested by them, in relation to the contractual requirements and the consequent fulfillment of legal and tax obligations;
- ii. allow an effective management of financial, commercial and administrative relationships;
- iii. comply with legal obligations;
- iv. verify the content's views of the Website, statistics, platform and hosting services, registrations and authentications and interaction with Social Networks and external platforms.

#### 3. TYPE OF DATA PROCESSED

We process:

- personal and tax data, as well as data of an economic nature that are necessary for the performance of relations with members of our company;
- video and photo of the Data Subject while using the medical device, for the purposes indicated in point 2 (i);
- Navigation Data Log files: The computer systems and applications dedicated to the operation of the Website www.ormesa.com detect some Navigation Data not associated with directly identifiable Web Users. The Data collected includes the IP addresses and domain names of the computers used by Web Users who connect to the Site, the addresses in URI notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server and other parameters concerning the operating system and the computer environment used by the User Web.

Generally, we do not process any data that qualifies as particular or of a judicial nature pursuant to articles 9 and 10 of the GDPR 2016/679; if it becomes necessary to process data of this type, we will request the consent of the Data Subject in advance.

#### 4. LEGAL BASIS OF THE PROCESSING

The processing of data will take place primarily for the need to fulfill legal, contractual or service obligations.

Failure to provide such data will make it impossible to establish or continue the relationship, to the extent that such data are necessary for the execution of the same.

The voluntary and explicit sending of e-mails to the addresses indicated in the different access channels of the website **www.ormesa.com** and the compilation of the "formats" specifically prepared imply consent to the subsequent acquisition of the address and data of the Web User, necessary to respond to the requests produced and / or provide the requested service.

#### 5. PROCESSING METHODS

The Data will be processed through the use of tools and procedures suitable to guarantee its security and confidentiality and can be carried out both on paper and through the use of electronic tools.

The Data will be stored in the Company's archives referring to the User, Customer or Supplier and processed exclusively by specially trained and trained personnel, as well as expressly authorized to process.

### 6. DATA RETENTION PERIOD

The Data will be processed for the entire duration of the relationship and also subsequently for a maximum period of 10 years, for the fulfillment of legal obligations and for administrative and commercial purposes or to defend our rights in court.

Once the retention periods indicated above have elapsed, the Data will be destroyed, deleted or made anonymous.

## 7. COMMUNICATION AND DISSEMINATION

The Data we collect from our users, customers and suppliers, are not "disseminated" by us, with this term meaning to give knowledge to indeterminate subjects in any way, including through their provision or consultation.

The Data of the Data Subject may instead be "communicated" by us, with this term meaning to give knowledge to one or more subjects determined in the following terms:

- to persons appointed within our Company to process the Data, expressly authorized to process and who have received adequate operating instructions, in particular to the employees of the Commercial and Administrative Office;
- to subjects who can access the Data by virtue of the provision of law, or community legislation, within the limits established by law;
- to subjects who need to access the Data for purposes auxiliary to the relationship, within the limits; strictly necessary to carry out the auxiliary tasks entrusted to them (e.g. credit institutions and freight forwarders);
- to other external subjects in their capacity as organizers and partners in institutional activities related to courses, meetings, congresses, and any other event to which the interested party adheres through Ormesa.

In such cases, the Data are processed by external parties operating as independent data controllers or be communicated to external subjects designated as managers, for the performance of tasks on behalf of our Company.

### 8. RIGHTS OF THE DATA SUBJECT - COMPLAINT

The Data Subject has the right to exercise the rights provided for by the GDPR by contacting the Company by e-mail at the address privacy@ormesa.com. In particular, the Data Subject has the right:

- i. to access the Data at any time;
- ii. to request the origin of the Data;
- iii. to request the updating, correction and integration of inaccurate and incomplete Data;
- iv. to request the cancellation or blocking of the Data;
- v. to oppose at any time the processing and use;
- vi. to oppose the use of the Data even for a single purpose referred to in point 2;
- vii. to obtain the limitation of the processing of Data;
- viii. data portability;
- ix. to revoke the consent to the processing, without invalidating the processing carried out up to the moment of validity of the consent and to lodge a complaint with the Supervisory and Control Authority in which he habitually resides or works or of the State in which the alleged violation occurred.