

SWIDENT S.R.L.

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**Information notice on the processing of personal data pursuant to articles 13-14 of Regulation (EU) 2016/679****Data Subjects: the contact persons at the Customers' companies.**

PROMED S.R.L., in its capacity as Controller of your personal data, pursuant to Regulation (EU) 2016/679 (hereinafter the "GDPR"), would like to hereby inform you that the aforementioned regulation provides for the protection of the data subjects with regard to the processing of personal data and that such processing will be performed in accordance with the principles of fairness, lawfulness, transparency and the protection of your confidentiality and your rights.

Your personal data will be processed in accordance with the legal provisions of the aforementioned regulation and with the confidentiality obligations laid down therein.

Purpose and legal basis of processing: specifically, your data will be processed for the following purposes which are connected to the fulfilment of legal or contractual obligations:

- fulfilment of the legal obligations related to the anti-money laundering rules and regulations (Law of 5 July 1991, no. 197 and subsequent amendments; Legislative Decree of 20 February 2004, no. 56; Law of 25 January 2006, no. 29; Ministerial Decisions of 3 February 2006, nos. 141, 142 and 143; Decree of the Italian Foreign Exchange Office of 24 February 2006);
- mandatory legal tax and accounting obligations;
- post-sales assistance;
- Advanced navigation purposes or personalised management of contents;
- purposes of Statistics and Analysis of browsing and users;
- accounting or treasury management;
- management of the relationship during sales transactions;
- management of disputes;
- management of customers;
- management of commissions;
- information via a data transmission system;
- Communication of Technical/commercial information;
- obligations laid down by current laws;
- planning of activities;
- customer satisfaction surveys;
- past customer invoices.

Modalities of processing. Your personal data may be processed in the following ways:

- by electronic computers with the use of software managed by Third Parties;
- by electronic computers with the use of software managed or programmed directly;
- assignment of processing operations to third parties;
- association or comparison of data, also when they originate from various public or private databases;
- collection of data with the use of IT and data transmission tools;
- collection of data from public registers, lists, acts or documents;
- processing with the use of electronic computers;
- manual processing with the use of paper-based archives.

Each instance of processing is performed in compliance with the modalities of articles 6, 32 of the GDPR and with the adoption of the appropriate security measures set forth.

Communication: your data will be communicated exclusively to competent persons who have been expressly appointed for the provision of the services that are necessary for the correct management of the relationship, with guarantee of protection of the rights of the data subject.

Your data will be processed by personnel expressly authorised by the Controller and, in particular, by the following categories of staff:

- Partners;
- the Administration department;
- the Marketing department.

Your data may be communicated to third parties duly appointed as Data Processors, specifically to:

- banks and credit institutions;
- chambers of commerce, industry, craft trades and agriculture;
- legal communication related to the anti-money laundering rules and regulations (Law of 5 July 1991, no. 197 and subsequent amendments; Legislative Decree of 20 February 2004, no. 56; Law of 25 January 2006, no. 29; Ministerial Decisions of 3 February 2006, nos. 141, 142 and 143; Decree of the Italian Foreign Exchange Office of 24 February 2006);
- consultants and freelancers, even associates;
- non-economic public bodies;
- insurance companies;
- constitutional bodies or with constitutional bearing;
- Forwarding agents, Carriers, Self employed drivers, Post offices, Logistics Companies.

Dissemination: Your personal data will not be disseminated in any way.

Storage Period. We would like to point out that, in compliance with the principle of lawfulness, purpose limitation and data minimisation, pursuant to article 5 of the GDPR, your data will be stored for a period of:

- a period of time no longer than that required for the fulfilment of the purposes for which the data are collected and processed, for the performance and fulfilment of contractual purposes;
- a period of time no longer than that required for the fulfilment of the purposes for which the data are collected and processed and in compliance with the mandatory periods of time laid down by the law.

Controller: the Data Controller pursuant to the Law, is SWIDENT S.R.L. (VIA CICOGNA 34/A ,40068 SAN. LAZZARO DI SAVENA (BO); e-mail: amministrazione@swident.it; telephone: 0516258657; VAT number: 02626621201) in the person of its legal representative pro tempore.

You have the right to obtain from the data controller the erasure (right to be forgotten), the limitation, the update, the rectification, the portability; you have the right to object to the processing of personal data that concern you, and, in general, exercise all the rights laid down in articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

The data protection officer (DPO) appointed by the data controller pursuant to article 37 of the GDPR is:
• Fabio EVANGELISTI (e-mail: service@swident.it).

You may also view at any time the updated version of this information notice by visiting the Internet address <https://www.privacylab.it/informativa.php707628350716>.

Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her are being processed, even if they have not yet been registered, and their communication in intelligible form.
2. The data subject has the right to obtain the indication:

- a. of the source of the personal data;
- b. of the purposes and modalities of processing;
- c. of the logic applied in case of processing of data performed with the help of electronic tools;
- d. of the details of the data controller, the data processors and the designated representative pursuant to article 5, paragraph 2;
- e. of the persons or categories of persons to whom the data may be communicated or who may become aware of the data in their capacity as designated representative in the territory of the State, as data processors or persons tasked with the processing of data.

3. The data subject has the right to obtain:

- a. the update, rectification or, when necessary, the integration of the data;
- b. the erasure, the anonymisation or the block of the data processed in violation of the law, including data the storage of which is not necessary in connection to the purposes for which the data were collected or subsequently processed;
- c. the attestation that the operations of letters a) and b) were notified, also regarding their content, to those whose data were communicated or disseminated, except in case where the fulfilment of this obligation turns out to be impossible or requires a use of resources patently disproportionate with regard to the right being protected;
- d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds to the processing of the personal data that concern him/her, even if they are related to the purpose of the collection;
- b. to the processing of the personal data that concern him/her for the purposes of sending advertising material or for direct sales or for market research or commercial communication.