



FRI.MED S.r.l.
Strada Fontaneto, 44
CHIERI (TO)

(Policy on the processing of personal data pursuant to Article 13 of Regulation EU 679/2016 and Article 13 of Legislative Decree 196/2003)

FRI.MED S.r.l., in its capacity of data controller (hereinafter also: “**Controller**” or “**FRI.MED**”) pursuant to Regulation EU 679/2016 (hereinafter: “**GDPR**”) and to Legislative Decree 196/2003 (hereinafter “**Privacy Code**”) – invites you, before communicating any personal data to the Controller, to carefully read this Privacy Policy since it contains important information on the protection of your personal data.

This Privacy Policy:

- is understood to be provided for the website www.frimed.it, (hereinafter: “**Website**”), as well as for requests by telephone on 011.9921161; fax 011.9921160; and by email info@frimed.it
- constitutes an integral part of the Website and of the services that we offer,
- is provided pursuant to Article 13 of the GDPR and of the Privacy Code to those who interact with the web services of the Website or who contact FRI.MED by telephone or by post.

The processing of your personal data will be based on the principles of correctness, lawfulness, transparency, purpose limitation and retention, minimisation and accuracy, integrity and confidentiality, as well as on the principle of accountability pursuant to Article 5 of the GDPR.

Your personal data will therefore be processed in accordance with the legislative provisions of the GDPR and the confidentiality obligations set forth therein, as well as with those of the Privacy Code currently still in force.

By processing of personal data we mean any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, as defined in Article 4(2) of the GDPR.

We hereby inform you that the personal data processed may consist of - also depending on your decisions on how to use the services - any information concerning your person suitable to identify you make you identifiable, including textual information, photographic or video images and of any other information provided.

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1. DATA CONTROLLER: WHO WE ARE AND WHAT WE DO

The data controller is FRI.MED. srl, with registered office in via Riva n. 26/19 – 14021 Buttigliera d’Asti (AT), and operational headquarters in Strada Fontaneto, 44 – 10023 Chieri (TO), VAT No 07356760012.

2. WHICH DATA WE PROCESS

We hereby inform you that the personal data processed may consist of - also depending on your decisions on how to use the services - an identifier such as name, an identification number, location data, an online identifier or one or more characteristic elements of your identity suitable to identify or make the data subject identifiable, depending on the type of services requested (hereinafter only "personal data" as defined in Article 4.1 of the GDPR).

The personal data processed through the Website is the following:

a. Browsing data

Computer systems and software procedures used for the functioning of the Website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified data subjects, but which by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of the computers used by users who connect to the Website, the addresses in Uniform Resource Identifier (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 (success, error, etc.) and other parameters related to the user's operating system and computer environment.

This data is only used to obtain possible anonymous statistical information on the use of the Website, to check its correct functioning, identify anomalies and/or abuses and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical cybercrimes against the Website or third parties.

b. Data provided voluntarily by you - Special Data

Without prejudice to reference to specific policies, this Privacy Policy is also provided for the processing of data voluntarily provided by you through the Website. In this regard, we invite you not to include in the form contained on the Website and not to communicate information that may fall within the special categories of personal data pursuant to Article 9 of the GDPR (for example, data referring to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life/orientation as well as genetic data, biometric data or data related to your state of health), unless it is specifically requested and subject to specific policy and possibly consent.

c. Third party data provided voluntarily by you

In the use of particular services, the processing of personal data of third parties, which you have communicated to FRI.MED, may occur. With respect to these cases, you are an autonomous data controller, assuming all the legal obligations and liabilities. In this sense, on this point you provide the broadest indemnity with respect to any objection, claim or request for compensation for processing damages, etc. that might be brought against the Data Controller by third parties, whose personal data has been processed through your use of the services of the Website in violation of applicable legislation on the protection of personal data. In any case, should you provide or otherwise process personal data of third parties in the use of the Website, you hereby guarantee - accepting all related liability - that this particular case of processing is based on prior acquisition – on your part - of the consent of the third party to the processing of information concerning him/her and its dissemination and that said processing will be carried out in accordance with the GDPR.

d. Cookies

Information on cookies used by the Website is available at the following address www.frimed.it

3. FOR WHICH REASON WE PROCESS YOUR DATA - PROCESSING PURPOSE

Your personal data will be processed, with your consent where necessary, for the following purposes, where applicable:

- 3.1.** to allow browsing of the Website and provision of FRI.MED services through the Website;
- 3.2.** to respond to specific requests, including telephone calls, addressed to FRI.MED;
- 3.3.** to fulfil any obligations under applicable laws, regulations or EU legislation, or satisfy requests from the authorities;
- 3.4.** to exercise the rights of the Controller;
- 3.5.** to fulfil contractual and pre-contractual obligations deriving from agreements in place with you;
- 3.6.** for statistical purposes, without it being possible to trace your identity.

Your personal data, also included in the special categories, will be processed using automated and non-automated tools.

Specific security measures are observed to prevent data loss, illicit or incorrect uses and unauthorised access.

4. LEGAL GROUNDS AND OBLIGATORY OR OPTIONAL NATURE OF PROCESSING

The legal grounds for processing personal data for the purposes referred to in the sections 3.1 e 3.2 and 3.5. is Article 6(1)(b) of the GDPR ([...] processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract), since processing is necessary for provision of the services. Provision of personal data for these purposes is optional, but failure to provide it would make it impossible to activate the services requested.

The legal grounds for the purpose referred to in section 3.3 is Article 6(1)(c) of the GDPR ([...] processing is necessary for compliance with a legal obligation to which the controller is subject). In fact, once the personal data has been provided, processing is indeed necessary to comply with the legal obligations to which FRI.MED is subject.

The legal grounds for the purpose referred to in section 3.4 is Article 6 (1) (f) of the GDPR (.... Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject...). In fact, once the personal data has been provided, processing is indeed necessary to pursue a legitimate interest of FRI.MED under the conditions indicated above. It should also be noted that the processing referred to in section 3.6 is not performed on personal data and therefore can be freely performed by FRI.MED.

Finally, in the event any provision of Special Data, if requested, Processing has legal grounds in your consent pursuant to Article 9(2)(a) of the GDPR ([...]the data subject has given explicit consent to the processing of those personal data for one or more specified purposes), subject to a specific policy.

5. RECIPIENTS OF PERSONAL DATA

Your personal data may be shared, for the purposes set out in section 3 of this Privacy Policy, with:

5.1. those that typically act as data processors, i.e.: i) people, companies or professional firms that provide FRI.MED with support and advice in accounting and administrative, legal, tax and financial matters or other type of advice; ii) those delegated to carry out technical or IT maintenance; iii) credit institutions, insurance companies; iv) companies and entities that are parents, subsidiaries or associates of FRI.MED, limited to the pursuit of administrative-accounting purposes connected with the performance of organisational, administrative, financial and accounting activities; v) distributors and agents of FRI.MED; vi) Carriers, Hauliers, Forwarders, Couriers, Postal Forwarders, for possible delivery of the goods; vii) paid service providers; viii) order fulfillment centers; (collectively "**Recipients**").

5.2. parties, bodies or authorities to whom it is mandatory to communicate your personal data in accordance with the provisions of the law or orders of the authorities;

5.3. persons authorised by FRI.MED for the processing of personal data necessary to perform activities strictly related to the provision of services, whether they are committed to confidentiality or have an appropriate legal obligation of confidentiality and who guarantee Data Processing in accordance with the GDPR.

The complete and updated list of the Data Processors is kept at the registered office of the Data Controller, situated in CHIARI, and may be sent by sending a written request to the Data Controller at the addresses indicated in the "Contacts" section of this policy.

6. TRANSFER OF PERSONAL DATA

Personal data is stored on servers located in the European Union. It is nevertheless understood that the Data Controller, if necessary, will have the right to move the servers also outside the European Economic Area. In this case, the Data Controller hereby ensures that said transfer will take place in compliance with applicable legislation based on a decision of adequacy or on the Standard Contractual Clauses approved by the European Commission. Further information is available by sending a written request to the Data Controller at the addresses indicated in the "Contacts" section of this policy.

7. RETENTION OF PERSONAL DATA

Personal data processed for the purposes referred to in section 3 will be retained for the time strictly necessary to achieve those same purposes and, since this is processing performed for the provision of services, up to the period of time envisaged and allowed by Italian legislation to protect FRI.MED's interests and right of defense, having regard to the limitation periods set by applicable legislation. Further information regarding the data retention period and the criteria used to determine this period may be requested by sending a written request to the Data Controller at the addresses indicated in the "Contacts" section of this policy.

8. RIGHTS OF DATA SUBJECTS

In your capacity as a Data Subject, pursuant to Articles 15 et seq of the GDPR and of Article 7 of the Privacy Code, you have the right to:

- i. obtain confirmation of the existence of personal data concerning you, even if not yet recorded, and communication of the same in an intelligible form;
- ii. obtain indication: a) of the origin of the personal data; b) of the processing purposes and methods; c) of the logic applied in case of processing carried out with the aid of electronic instruments; d) of the identification details of the controller, the processors and of the designated representative pursuant to Article 5, paragraph 2 of the Privacy Code and Article 3, paragraph 1, of the GDPR; e) the parties or categories of parties to which the personal data may be communicated or which may become aware of it in their capacity as designated representative in the territory of the State, processors or persons in charge of processing;
- iii. obtain (a) updating, rectification or, where interested, integration of data; (b) cancellation, anonymisation or blocking of data processed unlawfully, including data that is not required to be kept for the purposes for which the data was collected or processed; (c) certification that the operations referred to in points (a) and (b) have been notified, also as regards their content, to those to whom the data has been disclosed or disseminated, unless this requirement proves impossible or involves the use of means clearly disproportionate to the right protected;
- iv. object, in whole or in part: a) to the processing of personal data regarding you, even if pertinent to the collection purposes; (b) to the processing of personal data regarding you for the purposes of sending advertising or direct sales materials or for carrying out market research or commercial communications, through the use of automated call systems without the intervention of an operator, by e-mail and/or through traditional marketing methods by telephone and/or normal post. Please note that the data subject's right to object, as set out in point b) above, for direct marketing purposes through automated methods extends to traditional methods and that in any case this is without prejudice to the possibility of the data subject to exercise the right of objection even in part. Therefore, the disclosure may decide to receive only communications using traditional methods or only automated communications or neither of the two types of communication.



PRIVACY POLICY

Where applicable, the data subject also has the rights referred to in Articles 16-22 of the GDPR (Right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object, right to object to automated processing, including profiling).

Requests should be addressed to the Data Controller at the addresses indicated in the "Contacts" section of this policy.

You in any case have the right to file a complaint with the competent supervisory authority (Authority for the protection of personal data) pursuant to Article 77 of the GDPR, if you believe that the processing of your data is contrary to current legislation.

9. CHANGES

FRI.MED reserves the right to change or simply update the content of this Privacy Policy, in whole or in part, also due to changes in applicable legislation. In this case, FRI.MED will inform you of these changes as soon as they are introduced and they will be binding as soon as they are published on the Website. FRI.MED therefore invites you to periodically visit this section to be informed of the most recent and updated version of the Privacy Policy in order to be always updated on the data collected and on the use made of it by the Controller.

10. CONTACTS

To exercise the above rights or for any other request, please write to the Data Controller: FRI.MED Srl., with office in Chieri (TO) Strada Fontaneto 44, Chieri, e-mail privacy@frimed.it