

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF PERSONS WORKING FOR CLIENT COMPANIES

(Art. 13 Reg. EU 679/2016)

Brief information



Who processes my data?
The joint data controllers are:
Medica S.p.a.
Registered office: Via Degli Artigiani, 7 - Medolla (MO)
E-mail address: privacy@medica-spa.com
Medica Méditerranée
Registered office: Zone Industrielle, 7080 Menzel Jemil, Bizerte
E-mail address: administration.tn@medica-spa.com
Sar-Med S.r.l.
Registered office: Via Centauro, Zona Industriale 24, Iglesias (SU)
E-mail address: privacy@sarmed.it
Tecnoideal S.r.l.
Registered office: Via Lea Cazzuoli 43, Mirandola (MO)
E-mail address: privacy@tecnoidealsrl.com
Thf S.r.l.
Registered office: Via XXV Aprile, 5/7, Marzolarà (PR)
E-mail address: privacy@thf-salvatrici.it
Spindial S.p.a.
Registered office: Str. Nazionale, 18, Lemignano (PR)
E-mail address: privacy@spindial.it

For what purposes do the Co-owners process my data?	Why is the processing of my data legitimate?	To whom will my data be communicated?	How long will my data be stored for?
Management of the contractual relationship	Because it is necessary for the performance of a contract to which your company is a party or the performance of pre-contractual measures taken at your company's request	<ul style="list-style-type: none"> • Intra-group companies and the company maintaining the management software • Cloud provider • Trade Association • Professionals and/or professional consultancy firms in the tax, administrative and IT fields 	For 10 years after termination of the contractual relationship and for 2 years after expiry in the event of a dispute with the Inland Revenue Service
Promotion and marketing activities that you can always oppose*	Because based on the legitimate interests of the Controller		Until you object to the processing of your data
For defence and legal protection needs*	Because it is based on the legitimate interests of the Controller and for the possible defence of its own right in court	<ul style="list-style-type: none"> • Service providers closely linked to the management of the contractual relationship • Debt collection companies 	For 5 years from the expiry of the limitation period
What happens if I do not provide my data?	It will be impossible to properly establish or continue the contractual relationship. For marketing purposes only, you may object to the processing of your data without any consequences for the continuation of the contractual relationship.		

What are my rights?	With respect to your personal data that you have provided, you have the right to obtain <ul style="list-style-type: none"> • access • rectification • portability and in certain cases • deletion • limitation of processing • opposition to processing. You can exercise your rights by writing to privacy@medica-spa.com
Who can I complain to?	If you consider that your rights have been violated, you have the right to lodge a complaint with the Data Protection Authority via the procedure indicated on www.garanteprivacy.it .

Extended information



1. WHO PROCESSES MY DATA?

The Data Controllers of your personal data are:

- **Medica S.p.a.** with registered office in Medolla (MO), via Degli Artigiani, 7, which you can contact:
 - by e-mail to privacy@medica-spa.com
- **Medica Méditerranée** with registered office at Zone Industrielle, 7080 Menzel Jemil, Bizerte which you can contact:
 - by e-mail to administration.tn@medica-spa.com
- **Sar-Med S.r.l.** with registered office in Via Centauro, Zona Industriale 24, Iglesias (SU) that you can contact:
 - by e-mail to privacy@sarmed.it
- **Tecnoideal S.r.l.** with registered office at Via Lea Cazzuoli 43, Mirandola (MO), which you can contact:
 - by e-mail to privacy@tecnoidealsrl.com
- **THF S.r.l.** with registered office at Via XXV Aprile, 5/7, Marzolarà (PR), which you can contact:
 - by e-mail to privacy@thf-saldatrici.it
- **Spindial S.p.a.** with registered office in Str. Nazionale, 18, Lemignano (PR), which you can contact:
 - by e-mail to privacy@spindial.it

2. FOR WHAT PURPOSES IS MY DATA PROCESSED AND WHY IS THE PROCESSING LEGITIMATE?

PURPOSE	LEGAL BASIS	OBLIGATION TO CONFER
Management of the contractual relationship, with specific reference to the recording and processing of data on purchases and sales, the recording of accounting movements and the issuing of orders within the framework of the sale of medical devices and consumable parts.	The processing is legitimate because it is necessary for the performance of a contract to which your company is a party or the performance of pre-contractual measures taken at your company's request.	For this purpose you are required to provide your data on the basis of a contractual obligation.
Promotion and marketing activities exclusively by e-mail to which you can always object by writing to privacy@medica-spa.com or by clicking on the "unsubscribe/unsubscribe" button inside each promotional e-mail communication*	The processing is legitimate because it is necessary for the pursuit of the data controller's legitimate interest in promoting its own products or services similar to those you have already purchased, in accordance with the provisions of Article 130 of the Privacy Code (Legislative Decree no. 196/2003)	You provide your e-mail address automatically on conclusion of the contract with the Controller, but you may object to the processing of your data for this purpose at any time without any consequences for the proper continuation of the contractual relationship.
Legal defence and protection needs in particular in the area of debt collection*	The processing is legitimate because it is necessary for the pursuit of the legitimate interest of the Controller in defending its own right in court	For this purpose you are required to provide your data on the basis of a legal obligation.

3. TO WHOM IS MY DATA COMMUNICATED?

Your data is communicated to:

- Intragroup companies belonging to the business group of Medica S.p.a.
- Company maintaining management software
- Cloud service provider for document archiving management
- Trade association for tax advice purposes
- Professionals and/or professional consultancy firms in the tax, administrative and IT fields
- Service providers closely linked to the management of the contractual relationship
- Debt collection companies

You can request the full list of recipients of your personal data by writing to privacy@medica-spa.com. In any case, your personal data will not be disclosed.

4. IS MY DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

Your data is transferred outside the European Union. The transfer of your data is legitimate because it is subject to adequate guarantees based on the adoption of Standard Contractual Clauses (SCC).

5. HOW LONG IS MY DATA STORED FOR?

Your personal data will be retained for a period of time not exceeding that necessary to achieve the purposes for which it is processed. Specifically:

- for the purpose of managing the contractual relationship, your data will be kept for 10 years from the end of the contractual relationship on the basis of the civil law criterion of keeping relevant documents for accounting, tax and anti-money laundering purposes in accordance with the relevant regulations; for 2 years after the expiry of the use in any disputes with the Inland Revenue Service;
- for marketing purposes, your data will be stored until you object to the processing;
- for the purpose of defending the Controller in court, your data will be retained for 5 years after the expiry of the limitation period.

At the end of these periods, your data will either be irreversibly deleted - by means of destruction or secure deletion methods - or will be stored in an anonymous form that does not allow, even indirectly, for your identification.

6. WILL I BE SUBJECTED TO PROFILING?

Under no circumstances will your data be used to obtain information about your preferences or behaviour, nor will you be subject to any decision based solely on automated processing of your personal data.

7. WHAT ARE MY RIGHTS?

You have the following rights:

- **Right of access to data:** the right to obtain confirmation from data controllers as to whether or not personal data concerning you are being processed and, if so, to obtain access to your personal data - and a copy thereof - and to receive information about the processing;
- **Right to rectification of data:** the right to obtain from data controllers the rectification of inaccurate personal data concerning you without undue delay and the integration of incomplete personal data, including by providing a supplementary declaration.
- **Right to data deletion:** the right to obtain from the data controller the deletion of personal data concerning you without undue delay if one of the following reasons applies
 - personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
 - the data subject objects to the processing and there is no overriding legitimate reason to proceed with the

processing;

- the personal data has been unlawfully processed;
- personal data must be deleted in order to comply with a legal obligation to which the Data Controller is subject;
- personal data was collected in connection with the provision of information society services.

• **Right of restriction of processing:** the right to obtain from data controllers the restriction of processing when one of the following cases occurs:

- You challenge the accuracy of personal data for the period necessary for the Data Controller to verify the accuracy of such personal data;
- the processing is unlawful and you object to the deletion of your personal data and instead request that its use be restricted;
- although the data controllers no longer need it for processing purposes, the personal data is necessary for you to establish, exercise or defend a right in court;
- You objected to the processing pending verification as to whether the data controller's legitimate reasons prevail over yours.

• **Right to data portability:** the right to receive in a structured, commonly used and machine-readable format the personal data concerning you that you have provided to Data Controllers and to transmit such data to another data controller where the processing is based on consent or on contract and is carried out by automated means.

• **Right to object to processing:** the right to object to processing carried out for the performance of a task carried out in the public interest or in the exercise of official authority or on the basis of the legitimate interests of the data controller or a third party, as well as the right to object to the processing of personal data concerning you carried out for direct marketing purposes, including profiling insofar as it is related to such direct marketing.

• Right not to be subject to a **decision based solely on automated processing**, including profiling, which produces legal effects concerning you or significantly affects you in a similar way.

You may exercise your rights by sending a request to the e-mail address privacy@medica-spa.com. You will receive a reply as soon as possible and, in any case, no later than 30 days after your request.

8. HOW CAN I LODGE A COMPLAINT?

Should you wish to lodge a complaint concerning the manner in which your personal data are processed by the Data Controllers or concerning the handling of a complaint that you have lodged, you have the right to lodge a complaint directly with the Supervisory Authority in the manner set out at www.garanteprivacy.it.