

PRIVACY POLICY

Personal data processing information notice (Articles 13-14, EU Regulation no. 2016/679 and current Italian legislation)

ULISSE BIOMED S.R.L., with registered office in Udine, via Camillo Benso Conte di Cavour no. 20, postal code 33100, VAT reg. no. IT 02814430308, contact mail info@ulissebiomed.com, in its capacity **Data Controller**, pursuant to and for the purposes of **Articles 13-14 EU Regulation no. 2016/679** and of current Italian legislation, with its **Data Protection Officer** Franco Benini mail DPO@ulissebiomed.com, would like to inform you that your personal data will be processed in accordance with the following methods and purposes:

INDEX

1. Data collected and processed
2. Purpose and legal grounds for data processing
3. Data processing methods
4. Communication of the data processed
5. Period of retention
6. Data transfer
7. Rights of the data subject
8. How to exercise your rights
9. Amendments and updates

1. DATA COLLECTED AND PROCESSED

The Data Controller collects and processes:

- Personal data of Customers/Suppliers provided during the establishment of the contractual relationship and during its execution (including for example: name, surname, identity document, tax code, address, e-mail, telephone number), as well as payment data (information regarding payment methods e.g. credit card) or when subscribing to our “Newsletter”;
- Personal Data provided by Website Users to create an account or optionally provided by browsing the website www.ulissebiomed.com and the website

www.ladymed.it concerning preferences and interests (such as in particular: contents used, use of services, features used, connection times, traffic data, site browsing data and social profiles of the Data Controller or of commercial partners or third parties, IP address, devices and connection used) collected also by means of cookies and metadata;

- Personal data of Employees/Free Lances/Independent contractors mandatorily requested by law, regulation, Community law or for the establishment of the contractual relationship and during its execution (such as: name, surname, permanent address, contact information, etc.), data indicating health status/suitability or unsuitability to perform specific tasks, trade union orientation, religious or political beliefs communicated when subscribing an employment contract and/or managing the employment relationship, data relating the attendance at work communicated during management of the employment relationship and data related to the use of the company's information technology equipment (id est e-mail, internet history, phone calls etc.) collected in the event of investigations;
- Personal data which are manifestly made public by the data subject by publishing them on social networks **FB** and **LinkedIn** (opinion, interests etc.).

2. PURPOSE AND LEGAL GROUNDS FOR DATA PROCESSING

The personal data described above may be processed for the following purposes:

A) to fulfil a contract: Data processing is legitimate since the legal ground is based on the need to:

- perform the contract or fulfil the Data Controller's contractual obligations;
- fulfil pre-contractual, contractual and tax obligations resulting from the relationship with you;
- fulfil obligations arising from law, by a regulation, by Community law or by an order issued by an Authority (such as with regard to money laundering);
- exercise the Data Controller's rights (for example to allow the Data Controller to defend himself in Court, or prior to a Court action);

B) for the purpose of profiling: Data processing is legitimate since the legal ground for the same is based on the consent to:

- legitimise the analysis, including automated analysis, of preferences and interests (for example, use of content and services, including those purchased, features used, connection times, traffic data, etc.)

It's always possible to ask the Data Controller about the purpose and the legal ground of each data processing.

3. DATA PROCESSING METHODS

Your personal data will be processed in paper form and by digital means. All data will be processed in accordance with principles of correctness, lawfulness and transparency and may also be performed by using automated procedures designed to store, manage and transmit personal data using appropriate tools to ensure the security and confidentiality of the same by means of appropriate procedures that prevent risks of loss, unauthorised access, unlawful use and dissemination of data.

4. COMMUNICATION OF THE DATA PROCESSED

Your personal data may be provided to authorised personnel and/or data processors (such as persons who supervise the computer system [system administrators]), companies and/or professional partnerships that provide accounting, administrative, tax, legal, fiscal and finance assistance and advice (accountants, employment consultants, lawyers, etc.), subjects operating in the legal sector, counterparties and their legal representatives, collegiate arbitration courts and, in general, all public bodies (INPS [National Institute of Social Insurance], INAIL [National Institute for Industrial Accident Insurance], INL [Italian Employment Inspectorate], etc.) and private entities (funds, pension and assistance funds, trade unions, etc.), to whom your data must be communicated for the correct performance of the contract.

5. PERIOD OF RETENTION

The Personal Data are processed and stored for the time requested by the purposes for which they were collected. The Data Controller retains any personal data processed for the purpose of performing a contract for the period of time required to manage any contractual obligations or for the period of time reasonably

necessary to defend a right and in any case for the period time in which a claim may be pursued.

At the end of the retention period the Personal Data will be deleted. Therefore, at the end of this term the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

6. DATA TRANSFER

Personal data may also be communicated to other consultants and free lances and/or to offices of other associated/subsidiary companies to the Data Controller inside and/or outside the EU, which have signed an agreement with the Data Controller. Said offices/companies - with particular attention to those located in non-EU countries - have been provided with detailed operating instructions by means of contractual clauses that guarantee that personal data will be processed in accordance with the principles established in EU Regulation no. 2016/679 even third countries of destination. The Data Controller reserves the right to use cloud services, undertaking to select service providers from those providing adequate safeguards, as set out in Article 46 of EU Regulation no. 2016/679.

7. RIGHTS OF THE DATA SUBJECT

You are entitled to request from the Data Controller access to and rectification or erasure of your personal data, to have incomplete personal data completed or restrict the processing of any personal data provided. You are also entitled to receive any personal data concerning you in a structured, commonly used and machine-readable format. You also have the right to withdraw your consent to processing at any time and to object in full or in part to the processing of your personal data. You are further entitled to lodge a complaint with the supervisory authority and to exercise the other rights recognised to you pursuant to Articles 15 - 22 of EU Regulation no. 2016/679.

8. HOW TO EXERCISE YOUR RIGHTS

You may exercise your rights at any time by contacting the **Data Controller** by sending an e-mail to: info@ulissebiomed.com or the **Data Protection Officer**



Franco Benini by sending an e-mail to DPO@ulissebiomed.com or by lodging a complaint with the supervisory authority.

If you are no longer interested in our communications and would like to cancel your subscription to the Newsletter, click on the “cancellation” link at the bottom of each e-mail sent or send an e-mail to info@ulissebiomed.com

9.AMENDMENTS AND UPDATES

This information notice may be amended. Please refer to our website, company notice boards and other channels made available for updates. If you have any questions or concerns about our use of your personal information, please contact us using the above-mentioned details.

ULISSE BIOMED S.R.L.

Last update: 11th July 2019