



Information according to Article 13 of the E.U. Regulation 2016/679 - GDPR

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In compliance with the provisions on the processing of personal data set forth in the E.U. Regulation 2016/679, directly applicable and imperative in all its elements for all member states of the European Union as of May 25th, 2018, we inform you of the following:

1. DATA CONTROLLER, DATA COLLECTION AND PURPOSE OF PROCESSING.

We want to inform you that the company Vicky Grem S.r.l. (P.Iva and C.F. 03621210131), with registered office in Costa Masnaga (L.C.), Via G. Mazzini 2 (Tel. +39 031.879344 - PEC vickygremsrl@legalmail.it) - from now on also "Company" - is the Data Controller and Data Processor of your Personal Data under E.U. Regulation 2016/679. Your data are collected directly from you, as the data subject, or from third parties authorized by you, within the scope of the activity carried out by the company, and in any case for the following purposes:

- A) strictly related to and necessary for the management of contact requests or pre-contractual information, the possible conclusion of the contract and its subsequent execution and management, commercial and administrative assistance activities. The provision of data for this purpose is mandatory, the processing is lawful without the need for consent to the same, and in default, it will not be possible to provide the services requested;
- B) functional to our activities, such as marketing mechanical tools in general and medical devices, items for dentistry, dental technology, and similar products, by sending advertising, informational, promotional, and updating material on initiatives and offers to Customers. Consent to the processing of data for the purposes mentioned above is optional (it can be given in the manner indicated in Art. 8), and it is always possible to revoke it, exercising the right to object in the form and at the contact details stated below for the exercise of dues, in Art. 7 of this information.
- C) related to the fulfillment of obligations under E.U. and national regulations (for the preparation and registration of purchase invoices, sales, receipts, and cost slips, in fulfillment of legal obligations).

Specific consent is not required for such processing.

2. METHODS OF DATA PROCESSING.

Vicky Grem S.r.l. proceeds to the processing of data with the aid of electronic means or otherwise automated and is also carried out by third parties that the company may use to store, manage, and transmit the data themselves. The personal data processed will be kept for the time necessary to achieve the contractual purposes for which they were collected and processed, as well as, in any case, even after the termination of the assignment, for the time strictly necessary, provided for by the laws in force, for the documentation, for tax and accounting purposes, of the activity carried out. Data processing will be carried out with the logics of organization and processing of personal data related to the purposes indicated above and, in any case, in such a way as to ensure the security and confidentiality of the data.

The processing and storage of data will take place with technical methods constantly verified and updated, such as to guarantee their confidentiality and security, and with logic and through internal and external forms of organization strictly related to the purposes mentioned above and the tasks you gave. The activity of nominative, pseudonymous, and anonymous profiling of the data subject is excluded from data processing, i.e., any form of automated pro-

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cessing of personal data consisting in their use to evaluate certain personal aspects relating to a natural person, in particular, to analyze or predict aspects concerning economic situation, health, personal preferences, interests, reliability, behavior, location or movements of said natural person.

3. PURPOSE OF PROCESSING AND CATEGORIES OF PERSONS TO WHOM THE DATA MAY BE COMMUNICATED OR WHO MAY BECOME AWARE OF THEM AS EXTERNAL MANAGERS AND APPOINTEES.

For the pursuit of the purposes indicated above, Vicky Grem S.r.l. may communicate and have personal data processed domestically, to third parties with whom it has relationships, where these third parties provide services at the request of the company, namely:

- (a) agents or sales representatives and/or collaborators and/or employees, whom Vicky Grem S.r.l. may call upon to collaborate, as external processors or proxies, in the performance of the service requested by you; these parties do not assume the status of co-owners of the treatment, but of delegates from the Owner or External Managers of the treatment, which provide adequate guarantees on compliance with E.U. Regulation 2016/679;
- b) external legal, tax, and business consultants, if necessary, for the execution of the contract, who remain autonomous Data Controllers and guarantee Vicky Grem S.r.l. compliance with the Privacy regulations;
- c) Credit institutions for payment collection operations or for making payments in execution of the contract;
- d) subjects, public and private, who can access the data under provision of law, regulation, or E.U. legislation within the limits provided by these rules;
- (e) companies that perform packaging, shipping, and delivery services for purchases or that logistically organize the sending of mail and commercial information;
- f) other investee, parent, subsidiary and/or associated companies of Vicky Grem S.r.l. in Italy, if necessary for the execution of the contract;
- g) the dissemination of data to third parties and/or unspecified for purposes unrelated to the execution of the service object of the contract.

4. SPECIAL CATEGORIES OF PERSONAL DATA.

For the processing of personal data belonging to the categories referred to in Article 9 of the E.U. Regulation 2016/679 (i.e., data capable of revealing racial and ethnic origin, religious beliefs, philosophical or other views, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union nature, as well as data disclosing the health and sex life of the data subject), Vicky Grem S.r.l. specifies that these are data of which, for the exercise of the activity carried out, it will not come into possession and will not be subject to any processing; consequently, no form of consent will be collected from customers and suppliers, with regard only to employees employed by Vicky Grem s.r.l., the company avails itself of the provisions of Article 9(2)(a) and (b) of E.U. Regulation 2016/679, which provide for the lawfulness of processing when the data subject has given consent for one or more specific purposes, or when the processing is necessary to fulfill a legal obligation and exercise specific rights of the data controller or the data subject to the processing in the field of labor and social security law and social protection.

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5. HOW WE PROTECT PERSONAL DATA.

The company adopts technical and administrative security measures to reduce the risk of data loss, misuse, unauthorized access, disclosure, and tampering. The security systems used include but are not limited to, firewalls, controls of physical access to our computers through the provision of authentication systems, and the paper archive.

6. RIGHTS OF THE DATA SUBJECT.

We remind you that it is your right to exercise the rights established by Articles 15 to 22 of E.U. Regulation 2016/679, which consist of the prerogatives listed below:

- (a) the right to obtain confirmation as to whether or not personal data concerning you are being processed and, if so, to get access to the personal data and the information referred to in Article 15, on the purpose of the processing, the categories of personal data concerned, the recipients to whom the data have been or will be communicated; the period of data retention; proper to to know the existence of an automated decision-making process;
- (b) the right to obtain the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to obtain the integration of incomplete personal data, including by providing a supplementary declaration;
- (c) the right to obtain the erasure of personal data concerning you without delay; Vicky Grem S.r.l. has, consequently, the obligation to delete without undue delay the personal data if there is one of the reasons referred to in Article 17 of the E.U. Regulation 2016/679, except in cases of necessary processing;
- d) right to obtain the restriction of the processing of data in case of dispute of the correctness of the data, in case of unlawful processing, interest in the processing for the establishment, exercise or defense of a right in judicial proceedings, opposition to the processing pending verification of whether the data controller's legitimate reasons prevail over those of the data subject;
- e) obligation on the part of Vicky Grem S.r.l. to notify in the event of rectification or erasure of personal data or restriction of processing carried out according to Article 16, Article 17, paragraph 1, and Article 18 of E.U. Regulation 2016/679, unless this proves impossible or involves a disproportionate effort;
- f) right to the portability of personal data concerning you, provided to Vicky Grem S.r.l., if the processing is carried out by automated means, according to Article 20 of E.U. Regulation 2016/679;
- g) right to object to automated decision-making and profiling related to direct marketing, according to Articles 21 and 22 of E.U. Regulation 2016/679;
- h) right to complain with a supervisory authority if the data are not collected from the data subject;
- i) right to obtain all available information about the origin of the personal data collected;
- (j) right to withdraw consent at any time without affecting the lawfulness of the processing based on the consent previously given.

7. METHODS OF EXERCISING THE RIGHTS OF THE INTERESTED PARTY.

At any time, you have the right to exercise the above rights by sending an e-mail to the administration office of Vicky Grem S.r.l., with the subject "REF. PRIVACY", to the following e-mail address: amministrazione@vickygrem.com

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8. REQUEST FOR CONSENT FOR THE PROCESSING REFERRED TO IN POINT 1. B).

Vicky Grem s.r.l. Informs you that you may express your consent to the processing of your data personal data for the purposes functional to the marketing activities of mechanical tools in general and medical devices, items for dentistry, dental technology, and similar products, including by sending advertising, informative, promotional and updating material on initiatives and offers to Customers. Consent must be expressed by affirmative action and cannot be implied. Should you wish to consent to this type of processing of personal data, we ask that you respond positively to our e-mail containing this notice.

Costa Masnaga, Italy, May 15th 2018
Vicky Grem S.r.l.

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