

## **POLICY PROVIDED PURSUANT TO ART. 13-14 of EU REGULATION 679/2016 FOR COLLECTION OF CONTACTS FOR COLLABORATIVE AND INFORMATIVE PURPOSES ON THE COMPANY'S ACTIVITY**

Dear Sir, Dear Madam, C-Tech Implant S.r.l. in the person of its legal representative with registered office in VIA CESARE BATTISTI, 2 - 40123 BOLOGNA and Operating Office: Via Ravenna 382, 40018 San Pietro in Casale (BO) as Data Controller, following the entry into force of EU Regulation 679 / 2016 with regard to the processing of personal data and in compliance with the provisions of Article 13 and Article 14 of the provisions of the law in question, wishes to inform you of the following:

### **Purpose of the processing:**

Your personal data, freely provided by you and acquired by us, by reason of the management of commercial activities and for the development of new collaborations, will be treated lawfully and fairly for the pursuit of the following purposes related to the management of contacts for:

- initiation and maintenance of working collaborations with external partners.
- starting and maintaining working collaborations with aspiring internal collaborators;
- documentation of exhibition activities and training activities in general

The data are relevant, complete, and not excessive with respect to the purposes listed above for which they are collected and subsequently further processed.

### **Processing methods:**

The same data will be treated with analogical methods and residually with digital instrumentation, in compliance with current legislation and to protect its security and confidentiality, through the following methods: data collection from the interested party; data collection by electronic means; data retention for the period strictly necessary for the processing in question, for any need for legal protection and legal obligations.

### **Mandatory or optional nature of providing data:**

The interested party is required to provide all the requested data, which are limited to information strictly necessary for the purpose of carrying out the necessary operations aimed at the activities indicated in the chapter "Purpose of the processing".

### **Consequences of a possible refusal to answer:**

Concerning the processing activities with the purpose of "starting and maintaining working collaborations with external partners" and "starting and maintaining working collaborations with aspiring internal collaborators", failure to provide data will not give the possibility to proceed with the processing activities. It should be noted that the same are carried out as they are aimed at the execution of a contract of which the interested party is a party or at the execution of pre-contractual measures adopted at the request of the same, or to the pursuit of a legitimate interest of the owner.

As regards the processing for the purpose of documentation of the exhibition activity, the same is carried out for the pursuit of a legitimate interest of the data controller and it will not therefore be necessary to give specific consent for filming within the booth itself. The possibility remains for the interested party to exercise their rights as better set out below.

### **Data categories:**

The data processed by this activity are:

- Name and surname;
- Company to which it belongs;
- Mobile phone number
- Email address
- Corporate position
- Shooting images and photos in the exhibition booth and on the occasion of training activities.

Our structure has prepared and will further improve the security, access and custody system of data in accordance with the provisions of EU Regulation 679/2016 and the national and international legislation in force. The processing of sensitive data concerning you will take place with and without the aid of electronic and automated processors.

### **Communication of data to recipients:**

Your data may be communicated following inspections or checks (if requested), to all the inspection bodies responsible for checks and controls concerning the regularity of legal obligations. In the case of operations aimed at resolving disputes in

general, they may be communicated to the professional who provides legal assistance and advice to the company and to the competent judicial authority, or other public authority that requests it having the powers. This is without prejudice to the communication of data requested, in accordance with the law, by police forces, judicial authorities, information and security bodies or other public entities pursuant to Article 10, of EU Regulation 679/2016 for purposes defense or state security or the prevention, detection or repression of crimes. Your personal data are not subject to disclosure and are processed by the Data Controller, by the persons appointed as Data Processors, by the Data Protection Officer and by the internal personnel in charge of data processing.

The interested party may at any time exercise the rights reserved to him, sanctioned by article 15, article 16, article 17 and article 20 of which the full text is reported.

#### **Article 15 of EU Regulation 679/2016 - Right of access of the interested party**

1. The interested party has the right to obtain from the data controller confirmation as to whether or not personal data concerning him/her is being processed and, in this case, to obtain access to personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data in question;
- c) the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if they are recipients of third countries or international organizations;
- d) when possible, the retention period of the personal data envisaged or, if not possible, the criteria used to determine this period;
- e) the existence of the right of the interested party to ask the data controller to correct or delete personal data or limit the processing of personal data concerning him/her or to oppose their treatment;
- f) the right to lodge a complaint with a supervisory authority;
- g) if the data are not collected from the data subject, all available information on their origin;
- h) the existence of an automated decision-making process, including the profiling referred to in Article 22, paragraphs 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such processing for the interested party.

2. If personal data are transferred to a third country or to an international organization, the interested party has the right to be informed of the existence of adequate guarantees pursuant to Article 46 relating to the transfer.

3. The data controller provides a copy of the personal data being processed. In case of further copies requested by the interested party, the data controller may charge a reasonable fee based on administrative costs. If the interested party submits the request by electronic means, and unless otherwise indicated by the interested party, the information is provided in a commonly used electronic format.

4. The right to obtain a copy referred to in paragraph 3 must not affect the rights and freedoms of others.

#### **Art.16 EU Regulation 679/2016 - Right of rectification**

The interested party has the right to obtain from the data controller the correction of inaccurate personal data concerning him without undue delay. Considering the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, also by providing an additional declaration.

#### **Article 17 EU Regulation 679/2016 - Right to cancellation "right to be forgotten"**

The data subject has the right to obtain from the data controller the cancellation of personal data concerning him/her, without undue delay and the data controller is obliged to cancel the personal data without undue delay, if one of the following reasons exists:

- a) the personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
- b) the interested party revokes the consent on which the processing is based in accordance with Article 6, paragraph 1, letter a), or Article 9, paragraph 2, letter a), and if there is no other legal basis for the processing ;
- c) the interested party opposes the processing pursuant to Article 21, paragraph 1, and there is no legitimate overriding reason to proceed with the processing, or opposes the processing pursuant to Article 21, paragraph 2;
- d) the personal data have been unlawfully processed;
- e) personal data must be deleted to fulfill a legal obligation under Union law or the law of the Member State to which the data controller is subject;
- f) the personal data have been collected in relation to the offer of information society services referred to in Article 8, paragraph 1.

2. The data controller, if he/she has made personal data public and is obliged, pursuant to paragraph 1, to delete them, taking into account the available technology and implementation costs, he shall take reasonable measures, including

technical ones, to inform the data controllers who are processing the personal data of the request of the interested party to delete any link, copy or reproduction of his personal data.

3. Paragraphs 1 and 2 do not apply to the extent that processing is necessary:
- a) to exercise the right to freedom of expression and information;
  - b) for the fulfillment of a legal obligation that requires the processing provided for by the law of the Union or of the Member State to which the data controller is subject or for the performance of a task carried out in the public interest or in the exercise of public authority of which the data controller is invested;
  - c) for reasons of public interest in the field of public health in accordance with Article 9 (2) (h) and (i) and Article 9 (3);
  - d) for archiving purposes in the public interest, for scientific or historical research or for statistical purposes in accordance with Article 89 (1), insofar as the right referred to in paragraph 1 is likely to render impossible or seriously prejudice the achievement of the objectives of this treatment; or
  - e) for the assessment, exercise or defense of a right in court.

#### **Article 18 Right to limitation of treatment**

The interested party has the right to obtain from the data controller the limitation of the processing when one of the following hypotheses occurs:

- a. the data subject disputes the accuracy of the personal data, for the period necessary for the data controller to verify the accuracy of such personal data;
- b. the processing is unlawful and the interested party opposes the cancellation of personal data and requests instead that its use be limited;
- c. although the data controller no longer needs it for processing purposes, personal data are necessary for the data subject to ascertain, exercise or defend a right in court;
- d. the interested party opposed the processing pursuant to article 21, paragraph 1, pending verification of the possible prevalence of the legitimate reasons of the data controller with respect to those of the interested party.

If the processing is limited pursuant to paragraph 1, such personal data are processed, except for storage, only with the consent of the interested party or for the ascertainment, exercise or defense of a right in court or for protect the rights of another natural or legal person or for reasons of significant public interest of the Union or of a Member State.

The interested party who has obtained the processing limitation pursuant to paragraph 1 is informed by the data controller before said limitation is revoked.

#### **Article 20 EU Regulation 679/2016 - Right to data portability**

1. The interested party has the right to receive in a structured format, commonly used and readable by an automatic device, the personal data provided to a data controller concerning him/her and has the right to transmit such data to another data controller without impediments on the part of the data controller to whom he provided them if:

- a) the processing is based on consent pursuant to Article 6, paragraph 1, letter a), or Article 9, paragraph 2, letter a), or on a contract pursuant to Article 6, paragraph 1, letter b); is
- b) the processing is carried out by automated means.

2. In exercising their rights regarding data portability pursuant to paragraph 1, the interested party has the right to obtain the direct transmission of personal data from one data controller to another, if technically feasible.

3. The exercise of the right referred to in paragraph 1 of this article is without prejudice to Article 17. This right does not apply to the processing necessary for the performance of a task in the public interest or connected to the exercise of public authority referred to the data controller is invested.

4. The right referred to in paragraph 1 must not affect the rights and freedoms of others.

It also has the right to appeal to a national supervisory authority in accordance with the provisions of current legislation.

#### **Exercise of rights**

The requests to exercise the rights indicated in this information, including the right to cancellation and the right to revoke the consent given, must be addressed directly to the Data Controller at the email address [info@c-tech-implant.com](mailto:info@c-tech-implant.com) or to Data protection officer at the following address [massimo.dimenna@gruppoingegneria.it](mailto:massimo.dimenna@gruppoingegneria.it).

Place and date Bologna, 25/06/2021