



S.M.D. S.r.l.
Via Bruno Buozzi 41,
40057 CADRIANO-GRANAROLO DELL'EMILIA (BO)
Phone 051/766143 Fax 051/766093
e-mail : smdpodos@smdmed.com www.smdmed.com



Your data and the management of Customers and Suppliers A Brief Overview

Transparency first!

We will only use your data for the performance of a contract to which your Company is a party or for the execution of pre-contractual measures taken at the request of your Company as well as to comply with legal obligations.

Subject to the prior opt-out, Customers' data may also be used for marketing purposes by e-mail about products and/or services similar to those sold.

In the complete privacy below you will find all the information relating to the processing of your personal data: where, when, how and why we process your data, as well as a list of your rights.

Your data will not be sold or transferred to third parties

Your data (i.e. the data you entrust to us) will only be used by S.M.D. S.R.L.

We will never sell or give away your data.

If in some cases we will use Suppliers, please be aware that they will only act on our behalf and in accordance with our requirements.

How to contact us

The Data Controller is S.M.D. S.R.L., located in VIA BRUNO BUOZZI - CADRIANO - n°41, 40057 - GRANAROLO DELL'EMILIA - Prov.:BO.

You can contact us at any time by writing to silviabaldissera@smdmed.com.

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Privacy policy

Last updated: 12/22/2023

Introduction

This policy, provided pursuant to art. 13 and 14 GDPR, informs you about how, S.M.D. S.R.L. as Data Controller of personal data, collects, uses, shares and stores personal data during the process of managing relationships with its Customers and Suppliers.

What information do we collect, for what purposes, and what are the legal bases?

The provision of data is necessary for contractual purposes and for the fulfilment of the consequent legal obligations, any refusal to provide them will make it impossible to establish or continue the contractual relationship.

The processing of personal data will be based on the principles of lawfulness, fairness, transparency, proportionality and minimization and may also be carried out through IT methods suitable for storing, managing and transmitting them and will be carried out using suitable tools, as far as reasonable and state-of-the-art, to guarantee security and



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confidentiality through the use of suitable procedures that avoid the risk of loss, Unauthorized Access, Unlawful Use and Dissemination.

Purpose of the processing

The processing of your personal data is aimed at the management of the contractual/pre-contractual relationship with S.M.D. S.R.L. and the consequent fulfilment of legal and tax obligations, as well as for the effective management of financial and commercial relationships. The processing may also be aimed at pursuing any further legitimate interest on the part of the Data Controller (e.g. for the exercise and/or defense of a right in judicial, administrative or arbitration and conciliation procedures; to ensure the security of access to the Data Controller's premises, etc.) and in any case to fulfil legal obligations to which the Data Controller is subject, in particular in civil matters, tax and accounting, as well as to implement the provisions issued by the tax authorities or by authorities or supervisory bodies empowered to do so by law.

Marketing activities

S.M.D. S.R.L. does not carry out direct marketing activities by sending promotional communications by email; in any case, if such services are subsequently activated, S.M.D. S.R.L. will request specific and explicit consent before starting any Processing activity. In these cases, the legal basis for the processing will be the consent of the Data Subject and the refusal to provide it will not entail any consequence, in particular, for the proper execution of the contract.

In addition, any consent given for processing for marketing purposes may be revoked at any time, without prejudice to the lawfulness of the processing carried out before the opt-out.

S.M.D. S.R.L. may still send e-mails to its Customers even in the absence of prior consent pursuant to Article 130, paragraph 4, of Legislative Decree 196/2003 (Privacy Code, as amended) to promote products or services similar to those provided within the contractual relationship (so-called soft spam), provided that the interested party does not refuse such use, initially or on the occasion of subsequent communications.

Types of data processed

For the pursuit of the above purposes, S.M.D. S.R.L. may only process common data, including mainly:

identification and personal data (e.g. name, surname, etc.), contact data (e.g. telephone number, e-mail address, certified email), tax data (e.g. tax code), bank details, data relating to tasks, roles, assignments, work experience.

The processing of special categories of personal data is excluded.

Legal bases for processing

The legal basis on which the processing described in this paragraph is based is the need to perform a contract or to take steps prior to entering into a contract. The processing may also be necessary for compliance with a legal obligation to which S.M.D. S.R.L. is subject or necessary for the pursuit of S.M.D. S.R.L.'s legitimate interest in protecting its rights arising from the contract.



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Who do we share your data with?

Recipients of your data may be:

- our employees and/or collaborators who act on the basis of specific instructions provided by us regarding the purposes and methods of the processing in question;
- subjects (including Public Authorities) who may have access to personal data by virtue of regulatory or administrative provisions;
- all those subjects (suppliers) who, in the provision of their services, process personal data on our behalf and, for this reason, are formally designated as data processors.

Your data will not be disseminated, except in anonymous and aggregated form, for statistical or research purposes.

How long do we keep your personal data?

Personal data are kept for the time strictly necessary to achieve the purposes for which they were collected and processed on the basis of the purposes set out above. As a general principle, therefore, personal data will be stored for the period of time strictly necessary for the execution of the contract.

However, it is understood that, once the contractual (or pre-contractual) relationship with S.M.D. S.R.L. has been interrupted and, with it, the related purposes of the processing, the Data Controller will in any case be obliged and/or entitled to further store the personal data, in whole or in part, for certain purposes, as expressly required by specific contractual provisions (e.g. obligations of an ultra-active nature) or for legal obligations, in particular tax and tax matters, and for the possible assertion and/or defense, even in court, of the rights of \$TITOLARE\$ (e.g., in the event of possible disputes by the Data Subject with respect to the contract signed with S.M.D. S.R.L.).

Transfer of data to third countries

We will not transfer your personal data to countries outside the European Economic Area ("EEA"), which includes in addition to the member states of the European Union, Norway, Lichtenstein and Iceland.

In the event that this is necessary to pursue the purposes of the processing described in this Policy, our Organization guarantees that any transfer of data outside the EEA will take place in such a way as to ensure full protection of the rights and freedoms of the same. Where, with regard to the recipient third country, no adequacy decisions have been issued by the European Commission, data transfers will be carried out by adopting the safeguards provided for in Articles 46 et seq. of the GDPR, including the standard contractual clauses approved by the European Commission, and a thoughtful assessment of the legislation of any third country of destination.

Your rights and how to contact us

As a data subject, you may exercise the rights referred to in Articles 15 et seq. of the GDPR and, specifically, the rights of:

- obtain, at any time, confirmation of the existence or otherwise of the processing of the same data and obtain access to personal data and information regarding the processing;
- request the rectification of inaccurate personal data and the completion of incomplete personal data;



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- request, in the cases indicated by the GDPR, without prejudice to the special regulations provided for certain processing, the deletion or limitation of data, after the expiry of the established retention periods;
- request the portability of your data in accordance with the provisions of the GDPR and national legislation.

Requests must be submitted for privacy@smdmed.com.

Right to lodge a complaint

If you believe that the processing of your personal data is in violation of the provisions of the Regulation, you have the right to lodge a complaint with the Data Protection Authority, as provided for by art. 77 of the Regulation, or to take legal action (Article 79 of the Regulation).

Changes

S.M.D. S.R.L. reserves the right to make changes to this policy at any time, giving appropriate publicity to the Data Subjects and guaranteeing in any case adequate and similar protection of personal data. In order to view any changes, you are invited to consult this policy regularly or to contact us at the following e-mail: privacy@smdmed.com.