

PRIVACY POLICY

Pursuant to European Regulation 679/2016 on the protection of personal data

On this page, Villa Sistemi Medicali SpA intends to provide all the necessary information regarding the processing of personal data collected during any Internet browsing, following registration on the website or after contact with the Data Controller's company.

Villa Sistemi Medicali, as Data Controller of the personal data pursuant to EU Regulation 679/2016 (also "GDPR"), operates in full compliance with national and European regulations on the protection of personal data and pays great attention to the confidentiality of its users' personal data, complying with the security measures suitable to ensure the protection of the information collected.

Data Controller and DPO

The Data Controller is **Villa Sistemi Medicali Spa** with legal and operational headquarters in Buccinasco (MI), in via delle Azalee 3, which can be contacted via the following email: privacyvsm@villasm.com

The Data Controller has appointed a Data Protection Officer who may be contacted for all questions relating to the processing of personal data and for exercising the rights provided for by the GDPR: dpovsm@villasm.com

Type of data processed

1) Navigation data and cookies

By and large, it is possible to browse the website without having to provide any personal data. The website is divided into distinct sections, some of which require data to be entered, while for others this is not necessary.

During their normal operation, the computer systems used to operate the website acquire some personal data which are then implicitly transmitted when using Internet communication protocols.

This can be information on the geographical area from which you are browsing, on the device used, on the type of browser, on the pages viewed by the user during the session. We have decided not to store the user's IP address, effectively preventing his/her subsequent identification.

The navigation data are therefore stored anonymously and are used mainly for statistical information in order to check the correct operation of the website and to improve its use.

For further details on cookies, please refer to the appropriate [Cookie Policy](#).

2) Data provided voluntarily by users/visitors

When users/visitors communicate some personal data to access certain services or to make requests via email, Villa Sistemi Medicali acquires such data and processes them exclusively to respond to the request, to identify the user and to provide the service.

Registration on the Villa Sistemi Medicali website or any request for information and services by users may involve the collection and subsequent processing of personal data such as, for example, name, surname, email address, telephone number, address, profession, etc.

Purpose of the processing and legal basis

The processing of personal data takes place for various purposes which we describe in detail below with the related legal bases.

1. To manage website registration and to access particular sections of the website (e.g. restricted areas). To send the so-called "Transactional" emails, related to the registration procedure on the website and to maintain the account active (legal basis: execution of a contract and of pre-contractual measures - guaranteeing the service's operation)
2. To improve and personalise the user experience on the website (legal basis: execution of a contract and of pre-contractual measures - guaranteeing the service's operation; legitimate interest of the Data Controller)
3. Activities deriving from services contracted with customers or from requests for information concerning the products and the company (legal basis: execution of a contract or of pre-contractual measures; legitimate interest of the Data Controller)
4. To manage accounting, administrative, fiscal, etc., obligations required by Italian, European or international law (legal basis: legal obligation)
5. To comply with contractual terms, obligations and conditions (legal basis: execution of a contract)
6. To send adequate communications on products, services and company initiatives, to send periodic newsletters, to survey customer satisfaction, including via email, text message, telephone (legal basis: legitimate interest of the Data Controller, specific consent)

The Data Controller does not currently carry out profiling activities or processing that involve automated decision-making processes.

Should the Data Controller add further processing purposes other than those described, it will adapt this information note and ask for consent to the processing (if required) in the most appropriate manner.

Methods and duration of the processing

The processing of personal data is carried out through electronic procedures and supports and/or manually (e.g. on paper supports) for the time strictly necessary to achieve the purposes for which the data were collected and, in any case, in compliance with regulatory provisions in force on the matter. For marketing purposes, the data will be kept until consent is revoked.

In addition, the company is required to keep certain information based on legal requirements and for a time reasonably necessary to meet the legal requirements, resolve disputes, avoid fraud and abuse and apply its terms and conditions. Personal data processed for administrative, contractual and legal purposes are therefore kept for at least ten years.

In relation to all processing, the Data Controller and any Data Processor have adopted adequate physical, logical and organisational security measures in order to ensure the integrity, confidentiality and availability of the data.

Provision of data

In general, the provision of data processed for legal obligations and contractual execution is necessary. Any opposition to the processing in whole or in part may make it impossible for Villa Sistemi Medicali to enter into a contractual relationship.

For all other purposes, other than what has already been specified for navigation data, users/visitors are free to provide their personal data. Failure to provide these may only make it impossible to obtain what is requested or to be kept updated in the best possible way.

Transmission and Transfer of Personal Data

Personal data may be brought to the attention of employees or collaborators of Villa Sistemi Medicali who are formally entrusted and authorised to the processing and who receive appropriate operating instructions in this regard.

The Data Controller may communicate the data to:

- third parties in charge of executing activities related to the implementation of the services, who are appointed, where appropriate, as external Data Processors
- third parties for carrying out obligations according to law or the contract (e.g. Public bodies, supervisory authorities, police forces, banking institutions etc.).
- associated companies, partners and/or affiliated companies

No services are currently being used that envisage the transfer of personal data to third countries (outside the EU). Should using subjects located outside the European Union become necessary for technical and/or operational reasons, the Data Controller will manage the transfer on the basis of the provisions of Chapter V of the Regulation, thus adopting appropriate guarantees (by way of example: adequacy decisions expressed by the European Commission, adequate guarantees from the third party).

Personal data will not be disclosed in any way.

Rights of data subjects

The European Regulation recognises numerous rights to the data subject which we ask you to carefully consider. In particular, we wish to remind you of the following rights:

- access by the data subject:
 - confirmation as to whether or not personal data concerning him/her are being processed;
 - communication of the transfer of data to a third country or to an international organisation;
 - obtaining a copy of the personal data being processed (if, and only if, the rights and freedoms of others are not infringed);
- rectification;
- total erasure (right to be forgotten);
- limitation of processing;
- obligation of notification in case of rectification or cancellation of personal data or limitation of processing;
- data portability;
- contesting the data.

The data subject also has the right to receive timely communication in the event of a violation of personal data which may damage his/her dignity and freedom.

Finally, the data subject has the right to lodge a complaint with the Italian Data Protection Authority - Piazza Venezia 11 - 00187 Rome - urp@gdpd.it