

# PRIVACY POLICY

Rev.3 del 24/05/2018

## Owner of the Data Treatment

**Biotechware s.r.l.**

Via Cardinal Massaia, 83, CAP 10147, Turin

e-mail: [privacy@biotechware.com](mailto:privacy@biotechware.com)

The responsible of Data Protection is available at the e-mail address: [dpo@biotechware.com](mailto:dpo@biotechware.com)

## Types of Data collected

The data processed by Biotechware are the following:

Registration data- When you register, we acquire the following personal data, yours or the minor/incapable that may represent: first name, last name, address, telephone number, email address, password, tax code, etc..

Your account data- When you add new data to your profile, or change existing ones, we acquire personal data

Surfing data - When you log in to our system, it will automatically record any information that your computer sends us. This information may relate to the content uploaded, the transactions concluded, the operations carried out, the IP address and MAC Address from which you request the services, the date and time of your request, etc..

Cookie - When you use our services, we may send one or more cookies (small text files containing a string of alphanumeric characters) to your device. We use session cookies (which are deleted after closing the browser).

Communications - When you send us an email or any other communication, we will record the communication.

## Purposes of the Treatment of Collected Data

User Data is collected to allow the Owner to provide its Services.

The data will be processed with the following purposes:

- to provide you with our services,
- to safeguard the technical performance of our computer system,
- to comply with legal obligations and/or comply with orders from public authorities, including judicial authorities.

We may also process data, but in an aggregated and anonymous way, in order to elaborate analyses aimed at detecting the degree of satisfaction of our customers and the preferences granted to our services and to elaborate statistics.

By your consent, we will also process data to inform you about our services and news available on our site (adherence to these processing purposes is optional, if you deny your consent we will not process it and you can contact us at any time to ask us to stop).

# Methods and place of treatment of the Data collected

## Treatment method

The Holder takes all appropriate security measures to prevent unauthorized access, disclosure, modification or accidental destruction of Personal Data. The processing is carried out with organizational methods and logics strictly related to the purposes indicated.

The data will come:

- collected through IT equipment and / or remote,
- digitally recorded at our servers in our availability,
- protected from risks of destruction, modification, deletion and unauthorized access through efficient security measures of physical, logical and managerial nature,
- further processed, also on paper, according to the measure and time strictly necessary to carry out the purposes indicated previously.

In addition to the Holder, in some cases, other actors involved in Biotechware's organization may have access to the Data, appointed as Data Processors by the Holder.

The updated list of Managers can always be requested from the Holder of the Treatment .

## Legal basis of Treatment

The Holder processes Personal Data relating to the User if one of the following conditions is met:

- the User has given consent for one or more specific purposes;
- the processing is necessary for the execution of a contract with the User and/or the execution of pre-contractual measures;
- the processing is necessary to fulfil a legal obligation to which the Holder is subject;
- the processing is necessary for the performance of a task in the public interest or for the exercise of public authority vested in the Holder;
- the processing is necessary for the pursuit of the legitimate interest of the Owner or of third parties..

However, it is always possible to ask the Holder to define the concrete legal basis of each processing and in particular to specify whether the processing is based on the law, provided for in a contract or necessary to conclude a contract.

## Location

The Data are processed at the headquarters of the Holder and in any other place where the parties involved in the processing are located. For further information, please contact the Owner.

The User's Personal Data may be transferred to a country other than that in which the User is located. For further information, please contact the Holder.

In case of higher protection, the User has the right to obtain information about the legal basis for the transfer of Data outside the European Union or to an international organization under public international law or constituted by two or more countries, such as the UN, and about the security measures taken by the Data Controller to protect the Data.

If one of the transfers described above takes place, the User may refer to the respective sections of this document or request information from the Data Controller by contacting him/her at the details given at the beginning.

## Storage period

The Data are processed and stored for the time needed by the purposes for which they have been collected.

Therefore:

- Personal Data collected for purposes related to the execution of a contract between the Data Controller and the User will be retained until the execution of such contract is completed.
- Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until such interest is satisfied. The User may obtain further information about the legitimate interest pursued by the Owner in the relevant sections of this document or by contacting the Data Controller.

When the processing is based on the User's consent, the Data Controller may keep the Personal Data longer until such consent is withdrawn. In addition, the Data Holder may be forced to retain Personal Data over a longer period in compliance with a legal obligation or by order of an authority.

At the end of the storage period Personal Data will be deleted. Therefore, at the end of this period the right of access, deletion, correction and the right to portability of the Data can no longer be exercisable.

## Upper level of protection applicability

While most of the provisions of this document are valid for all Users, some are specifically submitted for a superior level of protection for the processing of Personal Data.

This superior level of protection is always provided when the treatment:

- is performed by a Holder located in the EU; i.e. it concerns Personal Data of Users located in the EU and is used to offer goods or services in return for remuneration or for free to such Users;

- it concerns Personal Data of Users located in the EU and allows the Holder to monitor the performance of such Users to the degree that such performance takes place within the EU.

## Third party communication

We may transmit the data to third parties who collaborate with us and process steps of the processes necessary for the proper performance of our activities, exclusively for the purposes indicated above.

We can also:

- communicate and spread your data, but only in anonymous and aggregate form, to disclose information on the use of our services:
- communicate your data to third parties in order to comply with legal obligations or to comply with orders issued by public authorities, including judicial authorities, to respond to claims that the data you have uploaded using our services violate the rights of third parties, or to protect our rights or those of third parties under the law and/or in compliance with the terms of service.

## Nature and Effects of the Provision

The provision of registration and navigation data is mandatory and indispensable to allow us to provide you with our services and if you refuse to provide this data we will not be able to provide you with our services.

The provision of other data is optional but without them we may not be able to provide you with certain services or certain features of the services.

## User Rights

Users may apply certain rights with reference to the Data processed by the Data Controller.

In case of superior protection, the User may exercise all rights set out below. In any other case, the User may contact the holder to find out which rights are available to him/her and how to exercise them.

Specifically, the User has the right to:

- withdraw consent at any time. The User may revoke the consent to the processing of his/her Personal Data previously expressed..
- oppose the processing of his/her Data. The User may object to the processing of his/her Personal Data when it is done on a legal basis other than consent. Further details on the right to object are indicated in the section below.
- access to his/her Data. The User has the right to obtain information on the Data processed by the Data Controller, regarding certain aspects of the processing and to receive a copy of the Data processed.

- verify and demand correction. The User may verify the accuracy of his/her Data and request that it be updated or corrected.
- get the limitation of treatment. When certain conditions are met, the User may request the limitation of the processing of his/her Data. In this case, the Data Controller will not process the Data for any other purpose other than their storage.
- obtain the deletion or removal of your Personal Data. When certain conditions are met, the User may request the deletion of his/her Personal Data by the Data Controller..
- receive his/her Data or pass it on to another data controller. The User has the right to receive his/her Data in a structured, commonly used and machine-readable format and, where technically possible, to have it transferred without any obstacles to another data controller. This provision is applied when the Data are processed by automated tools and the processing is based on the User's consent, on a contract to which the User is a party or on contractual measures connected to it.
- make a complaint. The User may submit a complaint to the appropriate personal data protection authority or take legal action in court.

### How to exercise rights

To exercise the User's rights, Users may send a request to the contact details of the Holder indicated in this document. Requests are deposited free of charge and processed by the Data Controller as soon as possible, in any case within one month.

## About Cookies

You can control and/or delete cookies as you wish - to learn more, visit the site

<http://www.allaboutcookies.org/>

You can delete cookies already on your computer and set most web browsers to disable their installation.

Most web browsers allows to:

- view the cookies stored and delete them one by one;
- block third party cookies;
- block cookies from particular sites;
- stop all cookies installation;
- delete all cookies when you close your browser.

If you choose to delete cookies, any preferences will be lost. Also, if you block cookies completely, the service may not work properly.