

# Privacy Policy

The General Data Protection Regulation (or, in short, GDPR) is a positive step towards people having more control over how their personal data is used. On the 25<sup>th</sup> of May 2018 this new legislation came into force and we, **Omnicos Group Srl** have modified a series of processes and policies to prepare our business. We are committed to protecting and respecting the personal information that is shared with us.

This statement describes the types of information we collect, how they are used, how we share them with other organizations, how rights can be exercised regarding the information we hold and how you can contact us.

With regard to direct marketing communications, it will always be possible to inform us to stop these activities. We will never send "unwanted" emails or communications and will not share data with anyone else. We do not resell the information to third parties, but we work closely with selected partners who help us to provide information, products and services that are required.

The content of this policy may change from time to time, so you may need to check this page occasionally to ensure that information is shared. Where possible, we will look for a direct contact to inform about any new changes.

## WHAT INFORMATION IS COLLECTED?

We collect personal information through the site, applications or direct contact. We only collect information that is necessary, relevant and appropriate for the purpose for which it is provided.

The information we collect may include some or all of the following:

- **Identity data:** Including first name, surname, username or similar identifier and title.
- **Contact information:** Including billing address, delivery address, e-mail address and telephone numbers.
- **Financial data:** Including details about the bank account and payment card collected exclusively for the purpose of completing the purchase.
- **Transaction data:** Including details about payments to and from the customer / supplier and other details about the products and services that are purchased or sold.
- **Profile data:** Including purchases or orders placed, any social profiles (if applicable), preferences, feedback, communications and responses to internal surveys, and your password and username if applicable (customer portal).
- **Usage data:** Including information on how the website is used, products and services.
- **Marketing and communication data:** Including preferences in receiving marketing communications and from third parties and communication preferences.
- **Technical data:** Including the Internet Protocol (IP) address, login information, browser type and version, time zone setting, types and versions of the browser plug-in, software and platform and other technologies on devices used to access corporate websites.

## How do we use the information that is collected?

Only the information necessary for the purpose for which it was collected is processed. You are given the option of not receiving marketing communications from us (and consent may be withdrawn at any time). No "unwanted" emails or communications are sent and data is not shared with anyone else, except to carry out the purchase or sale contract. Personal data are used exclusively for the purposes and legal bases indicated in the following table:

Purpose(s) for processing	Legal bases
<ul style="list-style-type: none"> <li>• We may use and process personal information where necessary to execute a contract and to fulfill and complete orders, purchases and other stipulated transactions and for contractual performance analysis.</li> <li>• To register a new customer, create and manage their customer account and provide services to the user.</li> <li>• Provide technical support of the product.</li> <li>• Provide training courses for the user and certifications to customers.</li> <li>• Manage the relationship, including order processing and delivery of the requested product or service or vice versa with suppliers.</li> </ul>	<p>Processing is necessary for the <b>execution of a contract</b> or to stipulate a contract.</p>
<ul style="list-style-type: none"> <li>• To provide information about our company and its products and services and to provide newsletters or email updates to the user;</li> <li>• To inform about special offers and products or services that might be of interest.</li> <li>• To understand the traffic flow on our website and provide a better website experience and understand the needs of our customers.</li> </ul>	<p><b>consent</b> - which can be withdrawn at any time.</p>
<ul style="list-style-type: none"> <li>• To measure the interest of customers and suppliers and</li> </ul>	<p>Processing is necessary to</p>

<p>improve our products, services and website.</p> <ul style="list-style-type: none"> <li>• To provide information, products or requested services.</li> <li>• To fulfill the obligations arising from any stipulated contract.</li> <li>• To help providing the highest level of customer care;</li> <li>• To manage and operate our website - to keep our website up to date and relevant, to develop our business and to inform our marketing strategy and monitor how our website is used.</li> <li>• To provide general information on the website and provide our products and services.</li> <li>• To ensure that the content of the website is presented in the most effective way.</li> <li>• To display more relevant advertisements on the website.</li> </ul>	<p>support <b>legitimate business interests</b> in the management of our business.</p> <p><b>Please note that you have the right to object to the processing of personal data carried out for our legitimate interest. That is, the right to object remains assured at any time.</b></p>
<p>For the prevention and detection of fraud, money laundering or other crimes or for the purpose of responding to a binding request from a public authority or a court.</p>	<p>The treatment is necessary to comply with legal and regulatory obligations</p>
<p>We may have to process personal information to contact you if you have an urgent security notice.</p>	<p>In rare cases of <b>Vitale Interest</b></p>

## How do we share this information?

We do not sell information to third parties. However, we may from time to time disclose the information to the following categories of companies or organizations that are responsible for managing services on our behalf: support service providers, customer contact centers, agencies and direct marketing consultants, market research and market analysis service providers, our legal advisors and other professionals.

We work to ensure that all third-party partners who manage the information comply with data protection legislation and protect information just like we do. We only disclose personal information STRICTLY necessary to provide the service they are undertaking on our behalf. We will aim to anonymize information or use specific aggregated data sets where ever possible.

## How long do we keep the information?

We will not store personal information in an identifying format for a longer period than necessary. For customers or suppliers, we will retain personal information for a longer period of time than processing potential customers / suppliers.

In the case of a continuous relationship (for example, a customer), we retain personal information for 10 years from the date on which our relationship ends. We retain personal information for this period to establish, bring or defend any legal claims. Our relationship could end for a variety of reasons.

Where we have obtained personal information following a request for information, brochures, quotations or any other information about any of our products or services, we store your personal information for 1 year and 6 months from the date we collect this information, unless that during this period an effective relationship is created, for example, a purchase. We will continue to process this data in line with the initial request for 6 months, so that we can establish a relationship with the potential customer / supplier. After this period the data will remain pending for 1 year before being removed, unless a relationship is formed within this time.

The only exceptions to the periods mentioned above are where:

- the law requires to keep personal information for a longer period, or to delete it beforehand;
- in the event that you have raised a complaint or concern about a product or service offered, in which case we will retain your information for a period of 10 years from the date of the complaint or request;
- the right to delete the information is exercised (where applicable) and it is not necessary to keep it according to one of the allowed reasons or required by law.

## How information can be managed

Each individual has the right to access personal information and make corrections if necessary. You also have the right to withdraw the consent you have previously provided to us and to request that we delete the information we retain. You may also object to the use of personal information (which we rely on processing for our business interests).

There are a number of rights regarding personal information under the Data Protection Act. In relation to most of the rights, we will request information to confirm the identity and, where applicable, to help us search for personal information. Except in rare cases, we will respond within 30 days of receipt of your request.

Users have the rights to:

- Request a copy of the information we have in our possession.
- Correct and update their information.
- Withdraw consent. Please see "How we use this information".

- Object to our use of user information (where we rely on our legitimate interests to use your personal information), provided that there are no legitimate reasons for continuing to use and process information. When we rely on our legitimate interests to use your personal information for direct marketing, we will always respect the right to object.
- Have their information deleted (or limited in use), provided that there are no legitimate reasons for continuing to use and process such information.
- Access information in a structured data file (in a format commonly used and readable by the machine), based on the given consent, to use and process personal information according to the contract.

In the case of a subject access request or a request for information, please be aware that if the request is unfounded or excessive, we may still charge a fee or refuse to act on the request.

Please also note that when we remove data from our system, or after the time periods indicated earlier in this document or upon request, the data is permanently removed from our system and may affect any subsequent access requests.

It is possible to exercise the above rights and / or manage the information by contacting us, using the details below:

Address: **Via del Commercio, 8/B**  
**26014 Romanengo (CR)**

Email: **info@omnicos.it**

In case of specific doubts about data protection or a complaint, you can contact our data protection team at [info@omnicos.it](mailto:info@omnicos.it)

## Where we store personal data

The personal data we collect can be transferred to, and stored in, a destination outside the European Economic Area (EEA), for the purposes described above, even in countries such as the United States of America or Russia, which do not provide an adequate level of protection in relation to the processing of data. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in compliance with this Privacy and Cookies Policy and data protection legislation. To the extent that personal data must be transferred outside the EEA, we will ensure that appropriate safeguards have been taken to protect the privacy and integrity of such personal data, including the model clauses of the European Union

pursuant to Article 46.2 (for example using the so-called *Binding Corporate Rules*). Please contact us if you wish to obtain information on these safeguards.

## Cookies

Cookies are text files that identify the computer (through the IP address) on our server. For information on the reasons for using them, please refer to the "How we use the information collected" section of this Privacy Policy. While in some cases it may be possible, we do not use the IP address as a means of identifying the user. Generally, it is possible to set the computer to accept or reject all cookies, and to be informed when a cookie is issued at any time, this can be done through the internet browser. With most browsers, this function can be accessed via the 'tools' menu (e.g. Internet Explorer), 'edit', or 'task' (e.g. Netscape). If there are problems finding this area, the "help" function within the browser will be able to provide assistance. You can also find more detailed information on cookies and how to manage them on <http://www.allaboutcookies.org>

If you refuse a cookie, this may prevent the site from functioning properly or even prevent access to certain areas.

**PRIVACY POLICY STATEMENT PURSUANT TO ART. 13-14 OF EU REG.  
2016/679-GDPR**

**(GENERAL DATA PROTECTION REGULATION)**

In the emergency related to the spread of the COVID-19 coronavirus epidemic, we provide below the information relating to the processing of your personal data in compliance with art. 13 of the European Union Regulation 2016/679 ("GDPR").

The principles of fairness, lawfulness, transparency and protection of your privacy and your rights are the foundation of this treatment.

**1. PROCESSING OF PERSONAL DATA**

The following data shall be processed, within the scopes and methods defined in this statement:

- a) data related to body temperature;
- b) information on close contacts at high risk of exposure, with suspected subjects or subjects tested positive to COVID-19 in the last 14 days;
- c) information regarding the origin from risk areas according to WHO indications, in the last 14 days.

The processed data refer to the following data subjects:

- a) staff and external consultants. This statement supplements that already provided for the processing of personal data functional to the establishment and implementation of the employment or consultancy relationship;
- b) suppliers; customers; contractors; visitors. Patients, relatives, guardians, referents, support administrators and patients' chaperones; guests and any other third party authorized to access the offices, spaces or other places related to your facility.

**2. PURPOSE OF DATA PROCESSING**

In order to implement the anti-contagion safety protocol, pursuant to art. 1, no. 7, lett. d) of the Decree Law of the Italian Presidency of the Council of Ministers dated 11<sup>th</sup> March 2020, personal data will be processed for these purposes.

**3. NATURE OF DATA PROVISION AND CONSEQUENCES OF THE REFUSAL TO RESPOND, LEGAL BASIS.**

Taking into account the purposes of data processing as illustrated above, we inform you that your personal data are processed without your explicit consent where deemed necessary to safeguard your health and the health of others (art.6, lett.d) GDPR – Decree Law no. 6 dated 23<sup>rd</sup> February 2020 (on urgent measures for the containment and management of the epidemiological emergency by COVID-19) and Decree Law of the

Italian Presidency of the Council of Ministers dated 11<sup>th</sup> March 2020, as well as to allow access to offices, spaces or other places in your facility (art.6, letter b) GDPR; the provision of data is therefore mandatory and the incorrect or partial provision or failure to provide such data may result in the impossibility to access the area.

#### 4. METHODS OF DATA PROCESSING.

Based on specific instructions provided in relation to the purposes and methods, the data processing is carried out by the staff acting on the basis of precise given instructions.

The same may be performed by a third party who acts as data processor formally appointed by the Data Controller pursuant to art. 28 GDPR and clearly identifiable and recognizable.

In the event where the body temperature shall be measured, the company does not carry out any recording of the data. The identification of the data subject and the recording of the exceeding of the temperature threshold could take place only if it was necessary to document the reasons for which access was prevented. In this case, the data subject will be informed.

#### 5. DURATION OF THE PROCESSING.

The data will be kept and will be processed for the time strictly necessary to pursue the aforementioned purpose of preventing contagion from COVID-19 and no later than the end of the state of emergency, currently set to 31<sup>st</sup> July 2020 in the Decision of the Council of Ministers dated 31<sup>st</sup> January 2020, i.e. until it will be necessary to process them due to:

- a) specific regulatory obligations;
- b) provisions of public authorities;
- c) any grounds for justice.

#### 6. DISCLOSURE OF YOUR DATA.

We inform you that your data will be disclosed:

- a) exclusively within the purposes indicated in this statement only to subjects internal to our Company expressly authorized;
- b) for the sole purposes referred to in the previous point to the appointed data processors;
- c) to all public entities for which there is or will be an obligation for the Data Controller to communicate the data.

Personal data will not be disclosed to third parties or disseminated, except for specific regulatory obligations (e.g. in the event of reconstruction of the chain of close contacts of an employee tested positive for COVID-19 and consequent request by the Health Authority)

## 7. YOUR RIGHTS.

In relation to the data processed by the company you can, at any time, exercise the following rights:

- . right to access personal data, to know which data are processed and the details related to the processing;
- . right to request rectification of personal data, which allows to request the amendment of inaccurate or obsolete data;
- . right to data portability, which allows to obtain a copy of the data that are processed for possible transfer to another data controller, other than the company;
- . right to obtain restriction of processing, where applicable as provided for by the applicable discipline;
- . right to erasure, which allows to request the erasure of personal data;
- . right to object, cessation of data processing (e.g. commercial communications);
- . right to lodge a complaint with the supervisory authority, for any reports, complaints or appeals to the Data Protection Supervisor: [www.garanteprivacy.it](http://www.garanteprivacy.it)

## 8. CONTACT DATA.

The Data Controller: **Cicchetti Marco**

can be contacted at: [s.cremonesi@omnicos.it](mailto:s.cremonesi@omnicos.it)