

PRIVACY POLICY

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INFORMATION NOTICE pursuant to Article 13 of EU Regulation 2016/679

(General Data Protection Regulation, known as "GDPR")

Data Controller and Purpose of the Document

Dear User,

MEDERE S.r.l., with registered office at Via Monasterace No. 43 - 00118 (Rome), in its capacity as Data Controller, wishes to inform you about the purposes and methods of processing your personal data.

This information is provided in accordance with Article 13 of European Regulation 2016/679 concerning the protection of individuals with regard to the processing of personal data (GDPR), and the applicable legislation in Italy.

Types of Data Processed and Purpose of Processing

1. a) Browsing Data

The IT systems and software procedures used to operate the website "medere.it" and the "Medere" APP acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified individuals, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of the computers used by users who connect to the site, URI (Uniform Resource Identifier) addresses of requested resources, time of the request, the method used to submit the request to the server, size of the file obtained in response, numeric code indicating the status of the server's response (successful, error, etc.), and other parameters related to the user's operating system and IT environment.

These data, necessary to use the website, are used only to:

- Obtain anonymous statistical information on site usage
- Ensure the website functions correctly

Browsing data is deleted immediately after processing.

The data could be used to ascertain responsibility in case of hypothetical cybercrimes to the site; except for this circumstance, web contact data is not retained for more than seven days.

1. b) Data Voluntarily Provided by the User

The optional, explicit, and voluntary sending of emails to the addresses indicated on this site, the optional filling out of forms requesting information, registration, purchases, and/or newsletters, entails the subsequent acquisition of the sender's email address, necessary to respond to requests, as well as any other personal data included in the message or forms depending on the requested service.

Specific summary information will be progressively displayed or made available on the pages of the site prepared for particular services on request.

2. c) Cookies

This site uses cookies. By using our website, the user agrees to the use of cookies in accordance with the terms outlined in our Cookie Policy, which can be accessed from the site footer.



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Nature and Legal Basis of Processing

Apart from the data collected automatically through browsing, the user is free to provide personal data via email, phone call, or by filling out forms for information requests, registration, purchases, or newsletters.

Failure to provide such data may make it impossible to fulfill the requested service.

The personal data provided by the user are processed by MEDERE S.r.l. based on different legal grounds:

- The user has given explicit consent to the processing of their personal data;
- Processing is necessary for the performance of a contract to which the user is party or for pre-contractual measures taken at the user's request;
- Processing is necessary to fulfill a legal obligation to which the Data Controller is subject;
- Processing is necessary for the legitimate interests pursued by the Data Controller.

Methods of Processing

Personal data is processed using automated tools for the time strictly necessary to achieve the purposes for which it was collected.

Specific security measures are in place to prevent data loss, unlawful or improper use, and unauthorized access.

Data Disclosure and Access Scope

Personal data collected for the above purposes may be disclosed to:

• Third parties appointed as Data Processors pursuant to Article 28 of the Regulation.

Furthermore, the personal data may be processed by authorized personnel of MEDERE S.r.l., in accordance with Article 29 of the Regulation.

A full list of external recipients of your data is available upon request via email to: privacy@medere.it

Please note that the disclosure of personal data to public or private entities will only occur if required by law or regulation, or if necessary for institutional purposes.

Data Transfer

The management and storage of personal data will take place on servers located within the European Union, owned or used by the Data Controller or by duly appointed third-party Data Processors.

Currently, the servers are located in Italy. The data is not currently transferred outside the EU.

In any case, should it become necessary, the Data Controller reserves the right to move the server location within Italy, the EU, and/or non-EU countries.

In such cases, the Data Controller ensures that any transfer of personal data outside the EU will comply with Articles 44 and following of the GDPR, and other applicable legal provisions, by entering into agreements that guarantee an adequate level of protection.

Data Retention Period

With regard to the data processed by the company, you may exercise at any time the rights set forth

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in Articles 15 to 22 of the GDPR. In particular:

- (a) You may request from the Data Controller confirmation as to whether or not personal data concerning you is being processed, and, if so, obtain access to the following information:
 - The purposes of the processing;
 - The categories of personal data concerned;
 - The recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly recipients in third countries or international organizations;
 - The envisaged period of storage, or, if not possible, the criteria used to determine that period;
 - If the data are not collected from the data subject, all available information on their source;
 - The existence of automated decision-making processes, and, where present, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
 - The existence of appropriate safeguards pursuant to Article 46 concerning transfers to third countries or international organizations.
- **(b)** You also have the right to:
 - Obtain the updating, rectification, or integration of your data;
 - Request the deletion, anonymization, or restriction of data processing, within the limits of the law;
 - Object, in whole or in part, on legitimate grounds, to the processing of personal data;
 - Obtain data portability for electronically processed data, provided on the basis of consent or contract;
 - Withdraw consent at any time, where applicable.

Requests relating to the exercise of the above rights should be addressed to the Data Controller in writing, including via email, to: privacy@medere.it

Furthermore, if you believe your rights have not been respected or you have not received a response in accordance with the law, you have the right to file a complaint with the **Data Protection Authority** (Garante per la protezione dei dati personali) pursuant to Article 77 of the GDPR, or take legal action pursuant to Article 79 of the GDPR.

Changes to This Privacy Policy

This Privacy Policy may be subject to changes. You are advised to check this page regularly and refer to the most recent version.