

**INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA
ACCORDING TO REGULATION (EU) 2016/679**

This document provides the following information regarding the processing of personal data of our clients, prospective clients and related staff and other subjects of which our clients avail with reference to the contractual relationship (in the following also referred to as the "Contract") with our company (in the following "Personal Data"), carried out for the establishment and/or the performance of our professional services.

Data Controller

Data Controller of the processing of Personal Data for the purposes specified in this Privacy Information Notice is Fidia Farmaceutici S.p.A., with registered office in Via Ponte della Fabbrica 3/a, Abano Terme PD (in the following referred to as the "Company").

Categories of data processed

The Company may process – depending on the case and where necessary for the purposes described below – the following categories of Personal Data:

- a) biographical data (name and surname, date of birth, address, etc.);
- b) contact data (telephone number, mobile number, email etc.);
- c) any other data which is preparatory and/or relating to the establishment and/or the performance of the Contract.

Modalities of the processing

The processing of the Personal Data is carried out with procedures and measures which are appropriate to ensure security, in terms of integrity, confidentiality and accessibility, in compliance with the provisions of the applicable data protection law.

The Company will process the Personal Data both in paper form and by electronic and IT instruments.

The names and contact data which will be processed by the Company for the performance of the Contract may be included in Company's telephone, fax and e-mail directories, where necessary for the purposes specified in the following.

Characteristics of the processing

Purpose of the processing	Legal basis of the processing	Nature of the provision of personal data and consequences of failure in providing such data	Data retention period (or criteria to determine it)
1) Management of the contractual relationship			
Response to specific requests and establishment, management and performance of the Contract and compliance with any related contractual, administrative, accounting and legal obligations and fulfilments.	Necessity to establish/perform pre-contractual measures adopted at the request of the data subject and/or the Contract and/or any related fulfilment and/or obligation pursuant to the applicable law.	The provision of Personal Data for such a purpose is both a contractual and a legal obligation to establish/perform pre-contractual measures adopted at the request of the data subject and/or the Contract and/or any related fulfilment and/or obligation pursuant to the applicable law. In case of failure to provide Personal Data, response at possible requests the establishment and/or the correct performance of the Contract may be wholly or partly prevented.	Personal Data will be retained for the entire duration of the Contract or for a further period, if necessary to comply with obligations pursuant to the applicable law or to exercise and/or defend a right before relevant judiciary authorities, and wherever else is appropriate.

Subjects which may become aware of Personal Data or to which Personal Data may be communicated

Personal Data will be processed by subjects explicitly authorized by the Company, such as the staff involved due to specific necessities to perform the Contract, the staff of the business units Commercial Operation, Corporate Office, Administration, finance and audits and of the General Pharmaceutical Management .

Where necessary for the above purposes, Personal Data may be communicated to subjects which are external of the Company's organization such as, e.g., providers of goods and services, including ICT services, dispatch and delivery services, communication and advertising agencies, tax consultants, legal advisors, insurances entities and institutions, banks and other credit institutions, also abroad, and, as long as it is necessary for the performance of the Contract, to relevant public authorities and/or entities.

Where necessary for the above purposes, the Company may communicate Personal Data to other companies of the group to which it belongs.

The Company may communicate Personal Data to countries which are out of the European Union, which may not ensure the same level of security provided by the European law. Such transfer will be carried out if necessary for the performance of the Contract, or for the implementation of pre-contractual measures taken at data subjects' request, or as long as the transfer is necessary to ascertain, exercise or defend a right before judiciary authorities or to protect vital interests where data subjects are physically or legally incapable of giving consent or if data subjects have explicitly provided consent to the transfer.

In case of possible further transfers of Personal Data, the Company will carry out such transfers only:

- towards Third Countries, one or more specific sectors within a Third Country (as in the case of the EU-US Privacy Shield) or international organizations for which the European Commission deems that an adequate level of protection of personal data is in place; or
- if the recipient of the data obtained an appropriate certification or adhered to a specific code of conduct ensuring that the processing of personal data is carried out with safeguards which are appropriate under EU law; or
- if the Company implemented appropriate safeguards to protect Personal Data, by concluding contracts including the so-called Model Clauses, as prepared by the European Commission or prepared by the national Data Protection Authority and approved by the European Commission.

Further information about the safeguards adopted by the Company for such transfers, and a copy of such safeguards are available by contacting the DPO at the following email address: dpo@fidiapharma.it.

Rights

With reference to processing of Personal Data carried out by the Company, any concerned data subject is entitled to exercise in any moment, the following rights:

Right	Content of the right	Possible conditions to exercise the right
Right of access (Art. 15 of the EU Regulation 2016/679)	Right to obtain confirmation as to whether or not his/her personal data is being processed and, where that is the case, to require the access to the personal data, and to the information as referred to in Art. 15 of the EU Regulation 2016/679, and to obtain a copy of such personal data.	In case of request of further copies of his/her personal data a reasonable fee based on administrative costs may be charged. In addition, the request of the data subject to obtain copy of his/her personal data shall not adversely affect the rights and freedoms of others.
Right of rectification (Art. 16 of the EU Regulation 2016/679)	Right to indicate the possible inaccuracy of his/her personal data to obtain its rectification. Where necessary, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.	
Right to erasure (Art. 17 of the EU Regulation 2016/679)	Right to obtain the erasure of his/her personal data in cases under Art. 17 of the EU Regulation 2016/679. In such cases, such data will be erased and, if made public, taking account of available technology and the cost of implementation, reasonable steps shall be adopted to inform controllers which	The right to erasure may be subject to limitations under national and/or EU Law, such as in case of necessity for the Company to process data to comply with legal obligations or to ascertain, exercise and/or defend a right before courts.

	are processing the data of the request of erasure.	
Right to restriction of processing (Art. 18 of the EU Regulation 2016/679)	Such right provides the marking of stored personal data of the data subject with the aim of limiting its processing in the future. Where processing has been restricted in cases under the applicable law, his/her personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. The data subject has the right to be informed before the restriction of processing is lifted.	The data subject has the right to restriction of his/her personal data: a) if he/she contests the accuracy of personal data, for the necessary period enabling the Company to verify the accuracy of the personal data; b) if the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead; c) even though the Company no longer needs the personal data for the purposes of the processing, but personal data is required by the data subject for the establishment, exercise or defense of legal claims; d) the data subject has objected to processing pursuant to Article 21(1) of the EU Regulation 2016/679, pending the verification whether the legitimate grounds of the controller override those of the data subject.
Right to obtain communication of the recipients made aware in case of a rectification, erasure or restriction to the processing. (Art. 19 of the EU Regulation 2016/679)	Such right consists of the possibility to ask and to obtain from the Company the indication of the recipient made aware in case of rectification, erasure or restriction to the processing.	The communication to recipients will be carried out unless this proves impossible or involves disproportionate effort.
Right to data portability (Art. 20 of the EU Regulation 2016/679)	Right of the data subject to receive the personal data concerning him/her, which he/she has provided to the Company, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance.	Such right is applicable only if the processing is based on data subject's consent or is necessary for the performance of a contract of which he/she is a party, or for the implementation of pre-contractual measures taken at data subject's request and if the processing is carried out by automated means and anyway to the extent allowed under art. 20 of the EU Regulation 2016/679.
Right to object to the processing (Art. 21 of the EU Regulation 2016/679)	Right to object at any time, on grounds relating to data subject's particular situation, to the processing of personal data concerning him/her which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company or if such a processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions. Where personal data is processed for	The Company will no longer process data subject's personal data unless it demonstrates compelling legitimate grounds for the processing which override his/her interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

	direct marketing purposes, the data subject has the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.	
Rights relating to automated decision making, including profiling (Art. 22 of the EU Regulation 2016/679)	Right to obtain the indication of the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing. The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.	The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject or similarly significantly affects him/her does not apply within the limits and conditions set forth under art. 22 of the EU Regulation 2016/679
Right of withdrawal (Art. 7, par. 3, Art. 13 par. 2, letter c) and Art. 14 par. 2, letter d), of the EU Regulation 2016/679)	Where the legal basis of the processing of personal data is data subject's consent, he/she has the right to withdraw such consent at any time.	The request doesn't affect the lawfulness of the processing based on data subject's consent before its withdrawal.
Right to lodge a complaint with a supervisory authority (Art. 13, par. 2, letter d and art. 14, par. 2, let. e)), Art. 77 of the EU Regulation 2016/679)	Right to lodge a complaint with the relevant data protection supervisory authority, in particular in the Member State of data subject's habitual residence, place of work or place of the alleged infringement. The Italian Supervisory Authority is the Garante per la Protezione dei Dati Personali.	

In case of request to exercise the above rights, the Company could have the necessity to verify the identity of the data subject and, therefore, it will be necessary that the data subject provides his/her identifying data and the contact data essential to identify and contact him/her with reference to his/her request.

Possible limitations to the exercise of data subjects' rights, and to the consequent obligations of the Company, can be provided by the applicable law.

Contact details

For any further information regarding the above rights and to exercise them, as well as for any issue related to the processing of Personal Data, you may write to the Company's Data Protection Officer at: Fidia Farmaceutici S.p.A., Via Ponte della Fabbrica n. 3/A Abano Terme (PD); email: dpo@fidiapharma.it.