

# **CUSTOMER AND SUPPLIERS PRIVACY POLICY**

## **PROTECTION OF PERSONAL DATA**

EU general data protection regulation 2016/679 (GDPR)

As provided for in EU Regulation 679/2016 regarding the protection of personal data, particularly referring to art. 13 entailed in it, DENTAL ART S.P.A. provides the following information to its customer and suppliers:

### **DATA CONTROLLER**

The holder of personal data, namely, the one who shall take decisions regarding modality and aims of data processing, is

#### **DENTAL ART SPA**

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E-MAIL: [info@dental-art.it](mailto:info@dental-art.it)

To contact the director, please use the e-mail address: [privacy@dental-art.it](mailto:privacy@dental-art.it)

The personal data provided are necessary for the legal obligations.

The processing will be carried out in an automated and /or manual manner, in compliance with the provisions of art. 32 of Regulation (EU) n. 679/2016. We report that, in compliance with the general principle of accuracy, correctness, lawfulness, transparency, protection of confidentiality, limitation of conservation, pertinence, non-excessiveness and proportionality, pursuant to art. 5 of Regulation (EU) n. 679/2016, the data will be kept for the period of time necessary to achieve the purposes for which they were collected and processed.

### **PURPOSE OF THE TREATMENT**

The Data is collected and processed by the Company, for the entire duration of the contractual relations established and also subsequently, in the framework of its normal activity and for the pursuit of the following purposes:

- a) correct and complete establishment of the contractual relationship with the Customer / Supplier and execution of the relative contractual obligations;
- b) execute the purchase order from / sent by / to the Customer / Supplier, as well as to enable the Company to carry out all the various administrative, commercial, accounting and fiscal activities deriving from the order / supply;
- c) fulfilment of obligations required by laws, regulations, Community rules, as well as provisions issued by authorities legitimated by law;
- d) pursuit of improvement and development of the Company's business and its commercial relationships, through marketing, promotional, informational activities (e.g. sending newsletters), statistics and quality control and detection of customer satisfaction (carried out directly or possibly through the work of third parties and / or specialised companies designated as data processors or managers).

### **METHOD OF TREATMENT**

DENTAL ART S.P.A., as the data controller, and each of the external Managers as identified below, will manage and store the collected personal data with paper, computer or electronic tools for the time strictly necessary to achieve the purposes for which they were collected. Personal data may be processed within the limits and in concordance with the modalities set out in this statement by employees and collaborators of the Company designated as persons in charge of the data

processing, who will receive adequate operating instructions and will operate under the direct authority of the data controller.

Specific security measures, as provided for by art. 32 of Regulation (EU) 679/2016, are observed to prevent data loss, illicit or incorrect use and unauthorized access.

The Company protects personal data through the application of internationally recognized security levels, as well as through security procedures that protect personal data:

- from improper use or disclosure of the same;
- from an unauthorized modification;
- from accidental loss or destruction caused by an unlawful act.

The data is managed only by authorized personnel appointed by the data controller.

The Company informs that it does not proceed with any profiling of its customers, neither to adopt automated decision-making procedures for this purpose.

## **DATA STORAGE**

The acquired data will be stored for a period of time not exceeding the one necessary for the purposes for which they were collected or subsequently processed and in compliance with the prescribed terms imposed by law.

In the case of data processed for marketing purposes, the Customer / Supplier always has the right to revoke the consent given for this purpose and to object to the same processing for marketing purposes, in particular by sending an email to [privacy@dental-art.it](mailto:privacy@dental-art.it), requesting the deletion of your personal data / contact details in the registers or lists in which they were entered. The processing will be carried out as long as the Customer / Supplier does not exercise this revocation, with the consequent deletion of the data from the registries or lists in which they have been entered.

## **NATURE OF THE PROVISION**

The conferment of the data is not in itself obligatory, but it is in any case necessary since any failure to provide data with reference to the purposes indicated, determines the impossibility of the Company to establish and / or initiate contractual relationships with customers / suppliers. The provision of Data regarding the purposes referred to in the paragraph "Purpose of processing - letter d)" instead is merely optional and requires the consent of the interested party. Without his or her consent, the data subject may not be included in market searches, statistical analysis and surveys, as well as he or she may not receive commercial information and /or promotional offers.

## **COMMUNICATION TO THIRD PARTIES**

Personal data will be shared to DENTAL ART S.P.A. to respond to the information requests, or they can be communicated to the Bodies and Institutes for the implementations of legal obligations or to the judicial authority, when requested. The collected personal data may be communicated within the EU and transferred to countries outside the EU exclusively for the purposes specified above. Furthermore, the Company avails of other entities, companies and individuals to carry out certain types of activities such as sending e-mails, delivering parcels, making payments. In strict respect of any obligations envisaged by laws, regulations, community regulations, as well as by provisions issued by authorities legally entitled to this, personal data will not be disclosed, but may be notified to the following entities and /or their categories:..

- Company agents;
- freight forwarders and companies operating in the transport sector;
- credit and financial institutions;
- factoring company;
- insurance companies and credit insurance companies;

- professionals appointed by the Company and / or the Company's consultants;
- companies that provide services for the Company, including sending commercial communications;
- audit and accounting firms;
- firms dealing with databases which aim at assessing the solvency of companies and / or providing commercial information;
- legal consultants.

The aforementioned subjects have access only to the personal data strictly necessary to perform their duties. The Company stresses that these third parties are forbidden from using the personal data for different purposes and are under a duty to use these data in conformity with this privacy policy and the statutory provisions currently in force.

## **RIGHTS OF THE INTERESTED PARTY**

In accordance with the provisions in Chapter III "Rights of the interested party" of Regulation (EU) n. 2016/679, the interested parties enjoy at any time:

- right to access the collected and processed data - art. 15;
- right to object to the processing - art. 21;
- right to non-submission to automated treatments - art. 22;
- the right to withdraw consent at any time, without prejudicing the lawfulness of the processing based on the consent given before the revocation - art. 7;
- right to submit a complaint to the supervisory authority - art. 77;

as well as all the "Adjustment and cancellation" rights referred to in Section 3 of EU Regulation 679/2016, shown below.

Requests should be sent by contacting the data controller at the following address:  
[privacy@dental-art.it](mailto:privacy@dental-art.it)

### ***Section 3 EU Regulation 679/2016 - Correction and cancellation***

#### **Art. 16 - Right of correction**

The Data Subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to obtain the integration of incomplete personal data, including by means of providing a supplementary statement.

#### **Art. 17 - Right to cancellation ("right to be forgotten")**

1. The Data Subject has the right to obtain from the data controller without undue delay the deletion of personal data concerning him/her. The data controller has the obligation to delete personal data without unjustified delay, when one of the following reasons exists:

- a) personal data are no longer necessary in relation to the purposes for which they were collected and processed;
- b) the interested party revokes the consent on which the treatment is based, if there is no other legal basis for the treatment (e.g. resignation);
- c) the data subject opposes the processing if there is no legitimate prevailing reason to proceed with the processing, or he/she opposes the treatment if the personal data are processed for marketing purposes;
- d) personal data have been unlawfully processed;
- e) personal data must be deleted to fulfil a legal obligation required by law to which the data controller is subject;

f) *omissis* ....

2. Where the controller has made the personal data public and is obliged to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. The preceding paragraphs shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for the compliance with a legal obligation requiring treatment ... *omissis*;
- c) ... *omissis* ...;
- d) ... *omissis* ...;
- e) for the establishment, exercise or defence of legal claims.

#### **Art. 18 - Right to restriction of processing**

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the deletion of personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted the purposes described above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence 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.

3. A data subject who has obtained the restriction of processing will be informed by the data controller before such limitation is lifted.

#### **Art. 19 - Notification obligation regarding rectification or erasure of personal data or restriction of processing**

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out under the articles cited above with to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

#### **Art. 20 - Right to data portability**

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the treatment is based on a contract;
- b) the processing is carried out by automated means.

2. In exercising his or her rights concerning data portability, the data subject has the right to obtain direct transmission of personal data from one data controller to another, where technically feasible.

3. The exercise of the right concerning the portability of data does not apply to the processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

4. The right to data portability shall not adversely affect the rights and freedoms of others.