

**PRIVACY POLICY ON PERSONAL DATA PROCESSING  
FOR EDUCATIONAL EVENTS IN HEALTHCARE FIELD  
General Data Protection Regulation (EU Regulation 2016/679)**

This Privacy Policy on personal data processing is provided to Healthcare Professionals that are interested in participating in educational events proposed by Bromatech S.r.l., as well as to receive contact from Third party for product information purposes.

**1. OWNER OF THE TREATMENT**

For the purposes referred to the present policy, the Data Controller is Bromatech S.r.l. with a registered office in Milan, Viale Premuda 46, Italy, VAT number and Tax Code 11702480150. The contact details are the following: email - [privacy@bromatech.it](mailto:privacy@bromatech.it)

**2. COLLECTED DATA AND PURPOSE OF THE TREATMENT**

Personal data processed by the Data Controller (personal data, contact data, professional data: hereinafter just Data), collected by the Data Controller or by Third party delegated by the company, are limited to those necessary for:

- a. Processing information requests received from Healthcare Professionals (individually also only "the Interested party) by email;
- b. In case of consent by the Interested party, for sending invitations to participate in future educational courses offered by Bromatech S.r.l to Healthcare Professionals;
- c. Still in case of consent, to transmit Data to Third party delegated by the company, that is aimed to provide information on products bearing the Bromatech S.r.l. brand (listed on the website [www.bromatech.it](http://www.bromatech.it))
- d. Fulfilment of legal obligations;
- e. Defence of the rights of the Owner.

Data processing for the purposes referred to the point a) listed above is mandatory.

Data collection for purposes referred to points b) and c) are optional and are subjected to explicit and separate policy, as provided by Section 8 of this Privacy Policy.

**3. LEGAL BASIS OF THE TREATMENT**

The legal bases of the treatment are the following:

- a. Pre-contractual obligations for the purposes referred to point a) above;
- b. Consent for the purposes referred to points b) and c) above;
- c. Legal obligations and legitimate interests for the purposes referred to points d) and e) above.

The withdrawal of the consent or request for cancellation and/or limitation of data processing foreclose the Data Controller from providing invitations to educational events and/or information on products which for Data have been collected .

**4. METHODS OF TREATMENT**

The Data Controller and the subjects involved will proceed with Data processing by using hard copy supports and/or electronic/IT tools, according to strategies strictly related to the purposes mentioned above and, in any case, in order to guarantee the security and confidentiality of the Data.

**5. RECIPIENTS OF THE DATA**

For legal and/or contractual requirements, the Data may be transmitted by the Data Controller to the following subjects or categories of subjects:

- a. to external partners and/or employees of Data Controller, that are authorized to process data;
- b. Corporate Authorities, such as, for example, the Steering Committee and its members;
- c. Supervisory Authorities;
- d. Lawyers, Accountants, Consultants, or other appointed Professionals;
- e. Public Authorities or Judicial Authorities.

**6. DISCLOSURE OF DATA**

The transfer of personal data to third countries inside/outside the EU or to international organizations may occur with the observance of suitable company policies and adequate procedures and, in any case, towards countries "whose level of data protection has been deemed adequate by the European Commission".

**7. DATA RETENTION PERIOD**

The foreseeable retention periods of personal data are as follows:

- a. Data processed for the execution of commercial purposes will be kept for a period of 8 years starting from the collection period of the consensus, except for its revocation or extension, and unless the need arises for further storage, to allow the Company to defend its own rights.
- b. Data processed for the fulfilment of legal obligations will be kept by the Company within the limits established by the Law and as long as the need for processing persists.

**8. RIGHTS OF THE INTERESTED PARTIES AND CONTACT DETAILS**

We inform you that, pursuant to the GDPR, the interested parties have the right to:

- a. Access to Personal data or request their rectification and/or cancellation;
- b. Invoke the limitation of Data processing;
- c. Oppose to its treatment;
- d. Revoke the consent on Data processing at any time, but only where the processing itself is based only on explicit consent;
- e. Data portability; only if Data processing has a consensus on its legal basis and takes place automatically. Furthermore, we inform you that no automated decision-making process of the treatment or profiling is foreseen by the Company;
- f. Lodge a complaint with the Data Protection Guarantor regarding the methods used to process Personal data, without prejudice to any other possibility of administrative appeal.

**9. PROTECTION OF THE RIGHTS OF THE INTERESTED PARTY**

The above rights may be exercised at any time by sending an email to Data Controller's office at the following address: [privacy@bromatech.it](mailto:privacy@bromatech.it). If the Company needs to process Personal data for a purpose other than the ones mentioned above, before such further processing, it will provide to the interested Party additional information on the matter.