

## **PRIVACY POLICY**

This information describes how the website is managed with reference to the processing of the personal data of users who consult it, as well as the processing practices of the data transmitted by the interested party to the Data Controller through this website.

In compliance with articles 13 (for data collected from the Data Subject) and 14 (for data not collected from the Data Subject) of EU Regulation 2016/679 (GDPR), the following information is provided to the Users of this Website, which refer exclusively to the processing carried out through this Website itself and not through other websites that may be visited by clicking on links therein, for which it is suggested to refer to the relative privacy policies provided by their respective Data Controllers.

This Website and any services offered through it are reserved for individuals who are eighteen years or over. The Data Controller does not collect personal data relating to minors. Upon request from these Users, the Data Controller will promptly delete all personal data involuntarily collected.

### **1. Data Controller**

Cultipharm Srl. with registered office in Via Cavriana 4/B, 46040 Guidizzolo (MN) - VAT 02655380208, as Data Controller of users' personal data on the website **www.cultipharm.it** provides below the information privacy pursuant to art. 13 of Legislative Decree 196/2003 (hereinafter, the "Privacy Code") and pursuant to art. 13 of EU Regulation 2016/679 of 27 April 2016 (hereinafter the "Regulation", the Regulation and the Privacy Code are jointly defined as "Applicable Regulations").

The Data Controller reserves the right to appoint a Data Processor to process the managed personal data for the purposes of technical assistance, maintenance, technical management and similar for this Website. The details of that web agency or consultancy may be requested at the addresses mentioned above. The Data Controller and the Data Processor also process Users' data with the assistance of their own Internal Employees, who are duly appointed and issued instructions for the correct processing of personal data, including spoken instructions.

**The Data Protection Officer may be contacted by email at the address:  
[privacy@cultipharm.it](mailto:privacy@cultipharm.it)**

### **2. Category of data processed and sources of origin**

- Browsing data
- Cookies, for which we invite you to read our cookie policy
- Personal Data voluntarily provided by the user, including:
  - Common data (identification data, personal data, billing data and similar)
  - Exceptionally particular data (art.9 GDPR)
  - Exceptionally criminal data (art. 10 GDPR)
- Sources: browsing, other websites, cookies and similar; user; public sources. We may primarily process browsing data, as well as cookies.

We may also process data provided voluntarily by the user, for example through the contact form or by sending a communication via e-mail, including common personal data (identification, personal data, billing and similar) and exceptionally particular data pursuant to 'art. 9 GDPR or penalties pursuant to art. 10 GDPR within the strict limits in which this is made necessary by the request for information received.



Data may come from automated sources or from voluntary sources, as well as from public sources. For example, they may come from user browsing, which may bring information about previous consultations of other sites, including in particular cookies and other similar technologies. The data may also be voluntarily provided by the user or by subjects related to him/her. Other data may come from public sources, such as those processed in the field of research and from corporate surveys, public database searches and similar.

### **3. Purpose of processing**

The personal data of the Users on the Website, as described above, will be processed in the ways and in the forms prescribed by the GDPR, for the performance of the Website's own functions, with particular, but not exclusive, reference to the collection procedures described therein, data, contact form, any registration process/access to the reserved area, subscription to the newsletter and the like.

In particular, the personal data provided to the Data Controller will be processed for the following purposes:

- to follow up the specific requests made to the Controller by the User through the Website and its communication tools (contact form, request forms and similar);
- for any subscription to the newsletter and the consequent sending of commercial communications and various information concerning the sector in which the Data Controller operates, with the specific consent given by the user;
- for communications of an informative nature relating to the services of the same Data Controller, following a request for information by e-mail, completing the contact form and other communication tools;
- for other accessory purposes or purposes connected to those indicated above and, in any case, falling within the scope of the Website's activities;
- for the processing of the e-mail address provided by the Data Subject in the context of the sale of a product or service, aimed also at sending, without further consent, communications for the subsequent direct sale of similar products or services to those subject to the sale itself; the interested party may in any case express his/her refusal and oppose this processing, both initially and subsequently, in an easy and free-way, following the instructions given in each subsequent communication.

The processing of data given in general will be carried out, even following automatic collection during navigation, for the sole purpose of verification and control of access to the Website. This also applies to technical cookies, to be understood as session cookies, functionality cookies or analytics cookies that meet the requirements specified by the Data Protection Authority. In particular, with regard to the latter, it is clarified that they can be assimilated to technical cookies where these are made and used directly from the Website. In any case, for these analytics cookies, the Website, also in compliance with the clarifications of the Guarantor, has provided for the anonymization of the IP addresses and the data processing amendment; the collection and use of the aforementioned browsing data (without prejudice to the anonymization of the IP addresses) allows for the monitoring of the Website's performance and allows us to improve the service offered, offering the User a better browsing experience. Please refer to the appropriate Cookie Policy for further information

### **4. Data collected through the Email platform**

For complete information, we specify that in sending communications via email, Cultipharm Srl. uses a compliant platform, which, through statistical tracking systems, allows the detection of the opening of a message, the clicks made on the hypertext links contained in the email extension, from which IP address or with which browser type the email is opened, and other similar details. The collection of such data is functional to the use of the platform and is an integral part of the functionality of the system for sending messages.



The User can also easily oppose further sending newsletters by clicking on the appropriate link for the withdrawal of consent, which is present in each email containing the newsletter. Once the consent has been revoked, the Controller will send an email to the User to confirm the revocation of consent.

#### **5. Legal basis for data processing**

The processing of personal data is based on the right to information, on the fulfillment of contractual or social contact obligations, or, where necessary, on consent by freely and consciously filling in the appropriate information fields in the dedicated form.

#### **6. Legitimate interest of the Controller**

The processing of personal data is also based on the legitimate interest of the Data Controller, such as the exercise of his rights in the context of the information society, the performance of the contractual service and the implementation of direct marketing operations.

#### **7. Mandatory transfer**

The provision of data relating to the browsing of Users, for the purposes indicated above, depends on the degree of privacy that the User has enabled or disabled through his/her browser.

In some cases, disabling could compromise the browsing on this Website. For certain forms of this Website, the provision of navigation data and/or the use of technical cookies is mandatory for the proper functioning of the Website.

The provision of some personal data is in any case necessary for the structure of the Website and its procedures. Any request for other optional data will be preceded by a special approval check-box. The provision of all other data is optional, in accordance with the type of information that the User wishes to provide to the Website.

#### **8. Data recipients**

The data may be communicated to associated, subsidiary and affiliated companies of the Data Controller, as well as to consultants, or also to third parties who operate, also in the name and on account of the Data Controller, for the performance of the services related to the purposes indicated in this statement, both intra-EU and extra-EU (in the latter case, it will be exclusively those subjects adhering to the Privacy Shield protocol).

Browsing data and similar (for which reference is made to the above), as well as profiling cookies even of third parties (for which reference is made to the Cookie Policy of this Website), which will be communicated to the respective third parties concerned, where these do not manage them directly as Data Controllers.

#### **9. Retention period**

The data provided by the Data Subject will be retained until the express revocation by the Data Subject, even by action on their browser, cleaning of cookies, express request or expressed in any other way.

The browsing data will be retained for the technical time necessary for the fulfillment of the functions for which they were collected.



## **10. Rights of the data subject**

Each Data Subject shall have the right to access, rectify, cancel (be forgotten), limit, receive the notification in the event of rectification, cancellation or limitation, portability, opposition and not to be the subject of an automated individual decision, including profiling, pursuant to the Articles 15 to 22 of GDPR. These rights may be exercised in the forms and in the terms set out in Art. 12 of the GDPR, by written notice sent to the Data Controller by e-mail at **privacy@cultipharm.it**

The Data Controller will respond as soon as possible and in any case within 1 month from receipt of the request.

## **11. Right to revoke consent**

You may revoke this consent at any time by sending an email to the Data Controller's address **privacy@cultipharm.it** or by express communication at the Data Controller's office.

## **12. Complaints**

Each Data Subject has the right to lodge a complaint pursuant to articles 77 and following of the GDPR to a Supervisory Body, which for the Italian State is identified in the Data Protection Authority.

The forms, methods and terms for proposing complaints are provided for and governed by the national legislation in force. The complaint does not prejudice the administrative and jurisdictional actions, which for the Italian State may alternatively propose to the same the Data Protection Authority or to the competent Court.

## **13. Profiling**

The personal data provided with this form will be subject to profiling.

Profiling allows the Data Controller to evaluate certain personal aspects of the Data Subject in particular to his/her preferences, interests, tastes with reference to the products sold and the activities carried out by the Data Controller, in order to allow the Data Controller to offer the Data Subject a more specific sales service, which is aimed at his/her needs.