

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

(artt. 13 e 14 Reg. EU 2016/679 and current italian law - D.lgs 196/2003)



Swiss  
Patents

CH 693 624  
CH 693 814  
CH 693 815  
CH 693 816  
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CH 694 954  
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CH 711 466  
CH 712 905  
CH 713 030  
CH 715 793

European  
Patents  
EP 1 646 359  
EP 2 561 858

25 patents  
registered in 4  
countries

67 trademarks  
registered in 105  
countries

Dears,

we would like to give you an overview of the way in which we process your personal data, not only to comply with legal obligations, but also because transparency and fairness towards data subjects is a fundamental part of our activity.

### Data Controller

The Data Controller of your personal data is Labo International Srl responsible towards you for the legitimate and correct use of your personal data and that you can contact for any information or request at the following addresses:

P.IVA	04656360288
Registered office:	Piazza Zanellato 5, 35131, Padova
Phone	+39 049 8078172
E-mail	privacy@labosuisse.com

### Data Protection Officer

The Data Protection Officer (DPO) can be contacted at the following addresses:

E-mail	dpo@labosuisse.com
PEC	dataprotectionofficer@pec.it

### Categories of data processed and data source

For the processing activities the Data Controller will process:

- personal data, such as personal details (as name, surname, date of birth, ...), fiscal code and other identification codes, addresses, contact data, payment data or data regarding economic, commercial, financial or insurance activities
- special categories of personal data, such as data suitable to reveal the state of health.

The processed data are communicated by you and/or by third parties, such as authorities and public bodies (e.g., Chamber of Commerce) or they are collected from publicly accessible sources

### Processing activities

Your personal data are collected and processed using automated, semi-automated and non-automated methods, as specified below

Processing	Purposes	Legal basis	Data retention *
Customer management	Managing customers' needs and requests	Performance of a contract or pre-contractual measures	10 years from the year of termination of the last contract

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Control of entry to company in relation to COVID-19 emergency	Preventing the infection by Covid-19	Limited to the fulfillment of legal obligations related to the containment of COVID-19 pandemic	Retention period imposed by regulations regarding the fulfillment of legal obligations related to the containment of COVID-19 pandemic
Marketing	Marketing (market analysis and surveys); Sending of informative and/or advertising materials, also by telephone or Internet	Consent by data subject	Until consent is revoked. Then processing will be limited to storage for 10 years from the year in which consent has been revoked
Customer Service	Monitoring customer satisfaction; Customer Support	Performance of a contract or pre-contractual measures	10 years from the year of termination of the last contract
Reception	Monitoring people entering the company and managing calls	Pursuit of legitimate interest of the Controller to protect company assets/employees' safety/organization and production needs	1 year from the year of data acquisition
Sale and pre-sale business activity	Promoting activities; Offering of goods and services	Legitimate interest of the Controller to promote goods and services; Performance of a contract or pre-contractual measures	10 years from the year of competence
Quality of service	Checking the quality of the service	Legitimate interest of the Controller to check compliance with internal procedures	10 years from the year of termination of the last contract
Contests	Management of prize competitions; Participant publication or winners	Consent by data subject. Performance of a contract or pre-contractual measures. Fulfillment of a legal obligation	10 years from the year the competition was awarded. For non-disseminated data: until consent is revoked, then processing will be limited to storage for 10 years from the year in which consent has been revoked
Guarantee	Fulfillment of product warranty obligations	Fulfillment of a legal obligation Performance of contract or pre-contractual measures For special categories of data: consent	10 years from the year of exercise of the right



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Billing and DDT	Shipping of goods	Performance of contract or pre-contractual measures	10 years from the year of termination of the last contract
Accounting	Keeping of accounting records; Tax compliance	Legal obligation	10 years from the accounting year
Management control	Internal business management control	Legitimate interest of the Controller to pursue business activity	10 years from the year of competence
Management and maintenance of IT systems	Management and maintenance of network and computer systems	Legitimate interest of the Controller to protect the functionality and security of the systems; Fulfillment of a legal obligation (limited to the provisions of the regulations regarding system administrators).	10 years from the year of termination of the contractual relationship for accounts, passwords, and usernames; 13 months for system administrator compliance;
Defense of interests and rights of the Controller	Prevent and/or detect possible abuse and defend the rights and interests of the Controller	Legitimate interest of the Controller in protecting its rights and interests in court or in the stages preparatory to its possible establishment	10 years from the year the data was given

\* In addition to the time related to prescriptive periods of mutual rights and the retention time of backups.

\*\* if you do not provide consent, personal data will not be processed for specific purposes. The consent can be withdrawn at any time by contacting the owner at the contact details indicated above.

### Provision of data

For the aforementioned purposes, the provision of your data is a necessary requirement, in case of denial to provide your personal data, it may not be possible to carry out the processing activities.

### Data recipients

Your data may be communicated exclusively for technical and operational needs strictly related to the aforementioned purposes, to subjects who process the data on behalf of the owner, appointed as data processors pursuant to art. 28 of the EU Reg. 2016/679 as well as to public bodies with respect to which there is a legal obligation to communicate (by way of example and not limited to the Chamber of Commerce, Revenue Agency).

### Data transfer outside the EU

The processing of personal data (e.g. storage, archiving and retention of data on its servers or in the cloud) will be limited to the areas of circulation and processing of personal data of the countries belonging to the European Union, with the express prohibition of transferring them to non-EU countries that do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection tools provided for by EU Regulation 2016/679 (adequacy decision by the European



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Commission, group BCR, model contractual clauses, consent of the data subjects, etc.).

## Rights of the data subjects

- You have the right, according to the provisions of art. 15 and following of EU Reg. 2016/679 to request the Data Controller to access your personal data, as well as their rectification or erasure.
- You also have the right to request data portability or restriction of processing;
- You have the right, on grounds related to your particular situation, to object to processing based on the legitimate interest;
- For processing based on consent, you have the right to withdrawn at any time the consent, without affecting the lawfulness of processing based on consent before its withdrawal;
- You can also lodge a complaint with the supervisory authority, Autorità Garante per la Protezione dei Dati Personali, based in Piazza Venezia 11, 00187 - Rome - [protocol@pec.gdpd.it](mailto:protocol@pec.gdpd.it)

To exercise your rights or to request additional information, you can contact the Data Controller using the contact information above.

## Policy updates

The Data Controller is entitled to make changes to this privacy policy at any time by updating the documents on this page. Therefore, visitors are invited to consult this link often, keeping as a reference the date of the last update indicated below.

Last update 29/08/2022

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below we provide you with some information that you need to bring to your knowledge, not only to comply with legal obligations, but also because transparency and fairness towards the interested parties is a fundamental part of our business.

### Data Controller

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P.IVA	04656360288
Registered office:	Piazza Zanellato 5, 35131, Padova
Telefono	+39 0498078172
E-mail	privacy@labosuisse.com

### Data Protection Officer

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E-mail	dpo@labosuisse.com
PEC	dataprotectionofficer@pec.it

### Categories of data processed and data source

For the processing activities the Data Controller will process data such as: personal details (as name, surname, date of birth, ...), fiscal code and other personal identification numbers, contact data, data regarding economic, commercial, financial or insurance activities.

The processed data are communicated by you and/or by third parties such as other suppliers and/or they are collected from publicly accessible sources.

### Processing activities

Your personal data are collected and processed using automated, semi-automated and non-automated methods, as specified below:

Processing	Purposes	Legal basis	Data retention*
Supplier management	Establishment and management of the contractual relationship	Performance of a contract or pre-contractual measures	10 years from the year of termination of the last contract



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Reception	Monitoring of people entering the company and managing calls	Pursuit of legitimate interest of the Controller to protect company assets/employees' safety/organization and production needs	1 year from the year of data acquisition
Accounting	Keeping of accounting records; Tax compliance	Legal obligation	10 years from the accounting year
Activity planning and control	Programming of activities	Legitimate interest of the Controller to pursue business activity	10 anni dall'anno di acquisizione del dato
Purchase	Purchasing of goods or services	Performance of a contract or pre-contractual measures	10 years from the year of competence
Management control	Internal business management control	Legitimate interest of the Controller to pursue business activity	10 years from the year of competence
Acceptance	Acceptance of goods	Performance of a contract or pre-contractual measures	10 years from the year of competence
Access control in relation to emergency COVID-19	Preventing the infection by Covid-19	Limited to the fulfillment of legal obligations related to the containment of COVID-19 pandemic	Retention period imposed by regulations regarding the fulfillment of legal obligations related to the containment of COVID-19 pandemic
Management and maintenance of IT systems	Management and maintenance of network and computer systems	Legitimate interest of the Controller to protect the functionality and security of the systems; Fulfillment of a legal obligation (limited to the provisions of the regulations regarding system administrators).	10 years from the year of termination of the contractual relationship for accounts, passwords, and user names; 13 months for system administrator compliance;





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Defense of interests and rights of the Data controller	Prevent and/or detect possible abuse and defend the rights and interests of the Data controller	Legitimate interest of the Data controller in protecting its rights and interests in court or in the stages preparatory to its possible establishment	10 years from the year the data was granted
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\*In addition to the time related to prescriptive periods of mutual rights and the retention time of backups.

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### Rights of the data subjects

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- You also have the right to request data portability, or restriction of processing.
- You have the right, on grounds related to your particular situation, to object to processing based on the legitimate interest.
- For treatments based on consent, you have the right to withdrawn at any time the consent, without affecting the lawfulness of processing based on consent before its withdrawal;
- You can also lodge a complaint with the supervisory authority, Autorità Garante per



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