

The new European General Data Protection Regulation (GDPR) has been in force since 25 May 2018.

This new Privacy Notice explains in simpler terms the basic rules concerning how your personal data are collected, why they are processed and your rights according to the above regulation and the Italian Code set out in Legislative Decree 101/2018

It is now easier to see the data and to change your consent preferences for the different processing purposes. A user-friendly language will be used to provide all the information concerning your personal data.

This new Privacy Notice replaces the previous one and will apply to all the services that our company provides you with.

**Privacy Notice in accordance with articles 13-14 of the GDPR 2016/679  
(General Data Protection Regulation) and subsequent Legislative Decree 101/2018**

## 1. What type of data we collect and the purposes

**Only data provided by you are collected and processed. No data are collected automatically.**

When you ask one of our customer service representatives for a quote or an intervention, either by email or telephone, you provide us with certain data that are used to fulfil your request or on the basis of legitimate interests as there is a pertinent and appropriate relationship between the data subject and the data controller (business relationship). These data include, for example:

Trading name	name and surname	e-mail address	telephone number
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If your request becomes an order, we complete the information necessary to fulfil the legal obligations we have to comply with

Tax Code	VAT number
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Where we take part in a call for tender, we collect all the data needed to comply contractually with the requirements of the end client. Occasionally potential clients may ask for our list of references. Your name could be part of this list.

**Your data may be sent** in electronic format or on paper, including and most commonly sent by email. Your data, included in a simple database, are stored on our server, protected by a hardware firewall and centralised commercial antivirus software with individual access permitted as shown below

SERVER	access by the data handler provided with a USER NAME and PASSWORD
MAIL	access by the data handler provided with a USER NAME and PASSWORD
COMPANY MANAGEMENT SOFTWARE	access by the data handler provided with a USER NAME and PASSWORD

The Data Processor and the Data Controller, in the person of the owner Giampaolo Adda, acts to ensure that data subjects' information will only be processed for the declared purposes and only the part that is strictly necessary for the processing. He furthermore undertakes, within reasonable limits, to change and correct all data that in the meantime prove to be different from the original, to keep them constantly updated and to delete all data that are superfluous to the declared processing, with the assistance of data handlers of which a list is available from the company on request.

### Profiling and lawfulness criteria

At the moment no communications or newsletters are contemplated and we do not engage in profiling, so no particular consent is required.

**As mentioned in the previous paragraph** your data, once collected and processed, are used to fulfil legal obligations that we must comply with regarding the service provided.

For this reason, pursuant to article 6 of the GDPR regarding the lawfulness criteria, the undersigned Data Controller declares that no consent will be asked for this processing.

- **Article 8 (personal data of children) - Article 9 (health, biometric and judicial data):**

In the processing of "customer" data, no children's data is included.

In the processing of "customer" data, no health, biometric or judicial data is included

## 2. Who is involved in the processing

According to the GDPR, **the Data controller** is the natural or legal person, public authority and any other organisation, association or body responsible, including in conjunction with another controller, for the decisions in terms of the purposes and methods of processing personal data and the means used, including the security profile. The Data controller is **ARIES MEDICAL srl, with registered office in Via Venezia, 105 – 31028 Vazzola (TV).**

*Its Legal Representative Giampaolo Adda undertakes to disseminate this Privacy Notice, the processing culture and the protection of the data to all stakeholders involved.*

*In accordance with the content of art. 37 of the GDPR points a) b) and c), the company is not obliged to designate a Data Protection Officer to monitor the compliance of personal data. For any requests concerning your personal data and respect of your privacy you can therefore write to us directly at [info@aries-online.com](mailto:info@aries-online.com)*

## **2.1 Persons to whom personal data may be communicated**

*The data collected as part of supplying the service may be communicated to the following third parties to execute the service itself, see also point 1*

- *Persons to whom the data must be communicated to deal with the contractual relationship*
- *Territorial agencies and Public Authorities for reasons of accounting/taxation*
- *Accountancy firms for reasons of accounting/taxation*
- *Banks for payments and Insurance Institutions*
- *Trainers, Consultants and Persons who provide verification services for the company certification systems*
- *Service companies (administrators, IT companies) appointed to take care of specific areas concerning the contractual obligations.*
- *Company employees responsible for performing the service*

*They may also be shared with partners / training companies but only if connected with the same purpose (see point 2). Under no circumstances will the data you provide be transferred or sold to third parties who have nothing to do with the purposes declared. Data will not be transferred to countries outside the EU.*

*ARIES MEDICAL SRL, works both inside and outside the European Economic Area and, in a specific and limited way for the contract in place, it can transfer or process the user's data in an external territory of the EEA, which does not have the same legal requirements for data protection within EEA.*

*Only and exclusively if your contact/order arrives or is sent to a country outside the European Community our company use standard contractual clauses approved by the European Commission to ensure that users data has the same equivalent levels of protection.*

*Users can contact us to request a copy of the standard contractual clauses, that we have signed with the entity responsible for data processing. Please note that some commercial information may be obscured.*

## **3. Duration of the processing and exercising your rights – articles 13 to 18 of the GDPR**

### **How to obtain information on your data, rectify it, delete it or request a copy**

*You have the right, at any time, to ask to see the personal data we hold for you and/or for it to be deleted, by writing to the email address: [info@aries-online.com](mailto:info@aries-online.com)*

### **How and for how long your data will be stored**

*Your personal data will be kept on paper and/or electronic format*

*The processing of "customer" data by its contractual nature and because of the legal obligations we have to comply with is for a non-specified length of time; nevertheless, we undertake to store the data only for the length of time strictly necessary to satisfy the aims stated in point 1, to respect your privacy and the applicable regulations. Invoices, the accounting documents and information relating to transactions are kept for 11 years in accordance with the law (including for tax purposes).*

*If you wish to exercise your right to be forgotten by making an express request that your personal data processed by the controller are deleted, you are reminded that these data will be stored, in a protected form and with limited access, solely in the interests of investigating and preventing criminal activities, for a period of no more than 12 months from the date of the request and will then be irreversibly deleted in a secure or anonymised way.*

*Lastly, you are reminded that for the same purposes, data regarding electronic communications traffic, but excluding the content of the communications, will be stored for a period of no more than 6 from the date of the request, pursuant to art. 24 of Law no. 167/2017, which transposed the EU Directive 2017/541 on matters of anti-terrorism.*

## **4. How we ensure the protection of your data**

*The data are collected by the persons stated in point 2, following the directions of the reference regulation, with special attention to the security measures required by the GDPR (art.32) for processing them by computerised, manual and automated means and with logics strictly consistent with the purposes stated in point 1 and in any case in order to ensure the security and confidentiality of the data.*

## **5. The Privacy Notice may be subject to modification**

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*This Privacy Notice may undergo modification. If any substantial changes take place in the way the Controller processes the user's data, the Controller will inform the user by publishing as clearly as possible any such changes in his pages or through alternative or similar means.*

*For any queries, please write to the email address: [info@aries-online.com](mailto:info@aries-online.com)*

Vazzola, 26/02/2021

*This document has been issued and re-examined before being published  
by the Data Controller of ARIES MEDICAL srl*