

CUSTOMER INFORMATION

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1. Premise

European Regulation EU/2016/679 (hereinafter "Regulation") establishes rules relating to the protection of natural persons with regard to the processing of personal data, as well as rules relating to the free movement of such data.

In compliance with the principle of transparency provided for by art. 5 of the Regulation, VIVABIOCELL SpA, in its capacity as employer and Data Controller, provides you with the information required by art. 13 of the Regulation.

2. Purpose of the Processing and nature of the provision

The Personal Data provided by the Data Subject, as defined in art. 4 no. 1 of the GDPR, will be processed in accordance with this information and, in any case, in compliance with the current legislation protecting them.

The processing of your personal data will be based on the principles of correctness, lawfulness and transparency, protecting your privacy, your rights and in accordance with the company privacy policy. The company also undertakes to process your data in compliance with the principle of "minimization".

The Data will be processed for purposes strictly connected or instrumental to the activity carried out by the Data Controller and, in particular:

- a) for purposes related to the management of the contractual relationship, the fulfilment of pre-contractual, contractual and tax obligations, functionally to the execution of the Contract to which the Data Subject is a party (Article 6 letter b GDPR), or to the pursuit of contractual or pre-contractual obligations (Article 6 letter b GDPR).
- b) for the fulfilment of obligations deriving from Laws or Regulations to which the Data Controller is subject, from EU legislation or from orders of the Authority (art. 6 lett. c GDPR);
- c) to send commercial communications relating to the Controller's activities by electronic mail, on the basis of the Controller's legitimate interests (Article 6(1)(f) and Recital 47 of the GDPR).

3. Processing methods

The processing of your personal data will be carried out using paper methods and IT tools in compliance with the provisions on the protection of personal data and, in particular, with the appropriate technical and organizational measures referred to in art. 32.1 of the Regulations, and with the observance of all precautionary measures that guarantee their integrity, confidentiality and availability.

4. Categories of recipients

4.1. Communication of personal data

Personal Data may be communicated to persons in charge of activities relating to the services and products offered, such as employees and collaborators of the Data Controller and communicated, pursuant to art. 2 of this Policy, to third parties (by way of example, to banks, consulting firms, technical partners, business partners). Furthermore, your data will be processed, exclusively for the purposes mentioned above, by company employees and/or collaborators, specifically authorized and instructed by the Data Controller pursuant to art. 29 of the Regulation.

In relation to these categories of recipients, the Data Controller undertakes to rely exclusively on subjects who provide adequate guarantees regarding data protection, and will appoint them as Data

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Processors pursuant to Article 28 of the Regulation. The list of Data Processors is available in the company and can be viewed upon request to the Data Controller.

Your personal data will not be disseminated, except as required by a law or regulation or by EU legislation.

5. Data transfer

The Data Controller may transfer the Personal Data collected to third countries only in accordance with a specific legal basis and, in any case, in compliance with the legislation protecting Personal Data.

6. Retention period

Your personal data will be processed for the time necessary to fulfil the pre-contractual and contractual purposes indicated above.

The data controller will keep your application as a customer for 10 fiscal years from the termination of the business relationship, after which, if these are not renewed, it will be deleted.

In particular, the data controller will keep your data as a Lead for 2 fiscal years from the sending of the last commercial contact or the closure of the feasibility study where applicable, a period of time within which it will process them for the purposes set out above. At the end of the contract, if it is not validated as a contract, they will be deleted.

For the purpose referred to under Section 2(c), your Personal Data will be retained until you exercise your right to object.

7. Rights granted to the data subject

At any time, you may exercise your rights against the Data Controller provided for by art. 15-22 of the Regulations.

In particular, at any time, you will have the right to request:

- access to your personal data;
- their correction in the event of inaccuracy of the same;
- cancellation;
- the restriction of their processing

It will also have:

- the right to object to their processing if processed for the pursuit of a legitimate interest of the Data Controller, if they consider their fundamental rights and freedoms violated;
- the right to data portability, i.e. the right to receive the personal data relating to you in a structured, commonly used and machine-readable format.

With respect to the purpose referred to under Section 2(c), the right to object may be exercised at any time by following the instructions provided by the Controller in its newsletters.

8. Identity and contact details**8.1. Data of the Data Controller**

The Data Controller is VIVABIOCELL SpA (Tax Code – VAT 02470470309), registered office in Via Del Cotonificio, n. 127, 33100 Udine (UD), in the person of its legal representative

8.2. Data of the Data Protection Officer

For all questions relating to the processing of your data and the exercise of your rights under the Regulation, you may contact the Data Protection Officer (DPO) at the following e-mail address: alessandro.natolino@heikosrl.it