

CUSTOMERS' PRIVACY DISCLAIMER

1. CONTROLLER AND CONTACTS

Personal data's Controller is Kardia S.r.l., specifically its legal representative Mr. Davide Longoni – mail address: info@kardia.it – physical address: Via Cormons 18 – 20151 Milan (Italy).

2. DATA PROTECTION OFFICER AND CONTACTS

Personal data's protection officer is Ms. Virginia Basiricò – mail address: dpo@kardia.it – physical address: Via Cormons 18 – 20151 Milan (Italy).

4. CUSTOMERS' DATA, PROCESSING PURPOSES, LEGAL FOUNDATION

DATA	PURPOSES	LEGAL FOUNDATION	KEEPING TERMS OR CRITERIA
Identification and contacts Bank account details Any other information related to the contracts when Kardia S.r.l. is the contractor Any identification and access data of the authorized users, when these are provided according to the contracts Personal and health data of patients (for contracts related to software licenses)	Fulfil a contract, in particular to enforce some clauses signed by the customer and ensure the effective deployment of products and services purchased To fulfil any legal obligations, in particular the ones stemming from the service rendered and the related administration procedures. To communicate (when needed) news and events to the customers To defend legitimate Controller's rights in case of any disputes with the customers, as well as to periodically control goods and services provided performance.	(Art. 6 1.b of GDPR) Performance of a contract or any pre-contractual obligations (Art. 6 1.c of GDPR) Legal obligation (Art. 6 1.f of GDPR) Controller's legitimate interest	10 years from the end of the contract to the utmost 2 years to the utmost, in case of providing information or answers users' requests

5. SOURCES

Processed data will be sourced through an internal Customer's contact, communications and transactions near the orders.

6. DATA PROVISION'S NATURE AND CONSEQUENCE FROM REFUSAL

Data providing and the related process are needed to fulfil the contract in place with Kardia; any refusal to provide the required personal data will cause the impossibility of starting or continuing the commercial relationship and the activities it involves.

7. PROCESSING METHODS AND KEEPING CRITERIA

Personal data processing is carried out through the activities mentioned in article 4 of GDPR. Data processing will happen through instruments able to guarantee their confidentiality, integrity and availability. In order to allow us to process your data according to GDPR, we need you to communicate us promptly any amendment, integration and updates. Your personal data will be kept for no longer than is necessary for fulfilling law obligations related to the commercial relationship, that is 10 years from its end or by the terms provided by law. After that timing, data will be destroyed, canceled or made anonym, considering also the technical destruction and back-up procedures and with the Controller's accountability needs.

8. DATA COMMUNICATION AND ADDRESSEES

Data will be shared, if specifically needed to fulfil the needs listed above, pursuant to the laws in force and/or a contract with the Controller, to:

- Internal employees authorized to process data for secretarial, technical, IT, commercial, administrative, coordination and control services and to the supervisory board;
- Suppliers of services ancillary to the one agreed, acting as Processors, such as industry professionals, companies in-charge for software and hardware maintenance, consulting companies for administrative, organizational and legal aspects.
The updated list of authorized employees and Processors is available at the Controller's premises.
- Third parties acting as Independent Controllers, such as: trade unions, travel agencies and hotels (related to work travels only), public entities and authorities, if strictly needed by the law in force or to exercise, ascertain and defend rights in court; banks, insurance companies, certification entities, etc. providing ancillary services.

9. AUTOMATED PROCESSES AND PROFILING

Personal data are not subject to automated decision-making processes, including profiling.

3. INTERNAL PRIVACY CONTACT PERSON

Privacy contact person in Ms. Simona Bruni – mail address: amministrazione@kardia.it - physical address: Via Cormons 18 – 20151 Milan (Italy).

10. PERSONAL DATA TRANSFER ABROAD

Personal data will not be voluntarily transferred abroad; any transfer outside the European Union will happen only to parties able to ensure adequate process protection levels and/or to countries whose authorities decided about the adequacy of the parties, that had given acceptable guarantees that the personal data process will happen through adequate law/contractual methods.

11. DATA SUBJECT'S RIGHTS

Pursuant to articles 15-18 and 20-21 of the UE Regulation no. 679 of 2016, you have the right to obtain confirmation as to whether or not personal data concerning exist, even if not registered yet, and their communication in a form that you can understand. You have the right to access the following information: a) personal data source, b) processing purposes and methods, c) logic involved for data processed through electronic means, d) identification data of the Controller, and Processors if any; e) the recipients or categories of recipient to whom personal data have been or will be disclosed as Processors or authorized persons. Moreover, you have the right to obtain: a) the data update, rectification, and, when interested, their completion; b) erasure, anonymization, or the denial of data processed violating law, including data whose keeping is not needed for the purposes data were collected or subsequently processed; c) certification that the parties data were communicated or disclosed to acknowledge the activities mentioned in points a. and b., including their content, except when this would be impossible or require clearly disproportionate means compared to the right protected. You have the right to oppose: a) to your personal data processing for legitimate reasons, although relevant to the gathering purposes; b) to your personal data processing aimed at sending advertisement, direct sale, market research or commercial communication. You have the right to data portability, that is receiving in a structured, understandable format your personal data and you have the right to communicate such data to other controllers.

Moreover, you have the right to file a complaint to a control authority (in Italy, the Data Protection authority; www.garanteprivacy.it).

12. HOW TO EXERCIZE RIGHTS

Written requests shall be submitted to the Controller at the addresses listed in paragraph 2 and 3. Exercise your rights is free pursuant to art. 12 of GDPR. However, in case of requests that are excessively expensive, including for their repetitiveness, the Controller could ask for a reasonable expenses refund, or could deny the request.