

**INFORMATION ON THE PROCESSING OF PERSONAL DATA
OF THE USERS OF THE WEBSITE hpsitaly.healthcare
Article 13 of EU Regulation 679/2016**

1. DATA CONTROLLER.

The Data Controller is Health Publishing & Services S.r.l., with registered office in Milan, Piazza Duca d'Aosta n. 12, VAT number 07106000966, in the person of its *pro tempore* legal representative, which can be contacted by writing to the e-mail address privacy@aboutpharma.com.

2. DATA PROTECTION OFFICER (DPO).

The Data Protection Officer ('DPO') supervises the processing of personal data and can be reached by sending an e-mail to dpo@aboutpharma.com.

3. PURPOSE AND LEGAL BASIS.

PURPOSE	LEGAL BASIS	PROVISION OBLIGATION
To allow the website navigation by the users. Navigation data (e.g. IP addresses or computer domain names) are acquired for the sole purpose of obtaining anonymous statistical information on the use of the website and monitoring its proper functioning.	The processing is based on the legitimate interest of the Data Controller, which consists in enabling users to navigate on the website and offering fast, agile, and efficient navigation	For this purpose, users provide data to the Data Controller automatically by navigating the website. Users are free not to provide their data without any negative consequence by not accessing the website.
To answer questions or respond to requests submitted by users.	The processing is based on the Data Controller's legitimate interest to respond promptly to requests and provide information to the users.	For this purpose, users are free to not provide their data, but in this case, the Data Controller will not be able to respond to requests.
To allow the sending of magazines relevant to the user's professional field.	The processing is based on the performance of a contract to which the user is party, i.e., the contract concerning the sending of magazines.	For this purpose, users are free to not provide their data, but in this case, it will not be possible to conclude the contract.
To send information material and/or communications about events and initiatives relevant to the user's professional field.	The processing is based on the eventual manifestation of the user's explicit consent, which can always be withdrawn by contacting the Data Controller.	For this purpose, users are free to not provide their data, but in this case, the Data Controller will not be able to send any communication.

4. RECIPIENTS OF THE DATA.

Users' personal data may be processed by third parties who act on behalf of Health Publishing & Services S.r.l. as Data Processors. Data recipients include, for example:

- service providers (communication services, hosting, etc.).
- website development companies.

A complete list of personal data recipients can be requested by contacting the Data Controller. Your personal data will not be disseminated or published.

5. TRANSFER OF DATA TO NON-EU COUNTRIES.

The data may be transferred outside the European Union. Health Publishing & Services S.r.l. is committed to only transferring users' data to countries that provide an adequate level of security. If data is transferred outside the European Union, this will be done in one of the manners permitted by applicable law, such as, for example, the choice of countries subject to Adequacy Decisions, the adoption of Standard Contractual Clauses approved by the European Commission or other appropriate safeguards.

6. DATA RETENTION.

The Data Controller will retain users' personal data for a period not exceeding that necessary to achieve the purposes of the processing. In particular, the data processed for sending magazines will be retained for the duration of the contract, and the following 10 years. The data processed for sending information material and/or communications about the events and initiatives of the Data Controller, will be processed until the withdrawal of consent given by the users. At the end of these periods, the Data Controller will erase the data irreversibly - through destruction or secure deletion methods - or retain it in an anonymous form that does not allow, even indirectly, the identification of the users.

7. PROFILING.

Under no circumstances the data will be used to obtain information about users' preferences or behaviour, nor will users be subjected to any decision based solely on automated processing of their personal data.

Please refer to the specific privacy policy for processing involving [cookies](#).

8. USERS' RIGHTS.

The Users have the following rights:

- **Right of access to data:** the right to obtain confirmation from the Data Controller that personal data concerning them is being processed, and if so, to obtain access to their personal data - and a copy thereof - and to receive information regarding the processing.
- **Right to rectification of data:** the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning them and the integration of incomplete personal data, also by providing an additional declaration.
- **Right to erasure of data:** the right to obtain from the Data Controller the deletion of personal data concerning them without undue delay where one of the following grounds applies:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
 - the users object to the processing and there is no overriding legitimate ground for the processing.
 - personal data have been unlawfully processed.
 - personal data must be deleted in order to comply with a legal obligation to which the Data Controller is subject.
- **Right to restriction of processing:** the right to obtain from the Data Controller the restriction of processing when one of the following cases occurs:
 - the users dispute the accuracy of personal data, for the period necessary for the Data Controller to verify the accuracy of such data.
 - the processing is unlawful and the users object to the deletion of the personal data and request instead that its use is restricted.
 - although the Data Controller no longer needs the personal data for processing purposes, the personal data is necessary to the users for the establishment, exercise, or defence of a right in court.
 - the users have opposed the processing pending verification of whether the legitimate reasons of the Data Controller prevail over those of the data subject.
- **Right to data portability:** the right to receive personal data concerning them, provided to the Data Controller, in a structured, commonly used and machine-readable format and to transmit such data to another data controller where the processing is based on consent, or contract and is carried out by automated means.
- **Right to object to processing:** the right to object to processing carried out for the performance of a task carried out in the public interest or in connection with the exercise of official authority or on the basis of the legitimate interest of the Data Controller or a third party, as well as the right to object to the processing of personal data carried out for direct marketing purposes, including profiling insofar as it is related to such direct marketing.
- Right not to be subjected to a **decision which is based solely on automated processing**, including profiling, and which produces legal effects concerning them or similarly significantly affects their person.

Users may exercise their rights by sending a request to the Data Controller's e-mail address privacy@aboutpharma.com, which will reply as soon as possible and, in any case, no later than 30 days from the request.

9. COMPLAINT.

Should users wish to make a complaint regarding how their personal data is processed by the Data Controller or regarding the management of a proposed complaint, they have the right to lodge a complaint directly with the Supervisory Authority according to the procedures indicated on the website www.garanteprivacy.it.

10. UPDATES.

This Information Notice is subject to periodic updates. The latest version was released on March 29, 2022.