

## **COOKIE POLICY AND PRIVACY POLICY**

### **IMPLEMENTATION OF THE POLICY AND LEGAL NOTES**

The following information regarding the processing of personal data carried out through the present website is released, according to the D. Lgs. 196/2003, adjusted by the D. Lgs. 101/2018 to the GDPR 679/16 EU (Art. 13,14) and of the Provision of the Guarantor of Privacy n. 229/2014, on the "identification of the simplified procedures for the information and the acquisition of consent for the use of cookies";

This privacy policy applies exclusively to the online activities of this website and it is valid for site users. It does not apply to the information collected through channels other than this website;

### **DATA CONTROLLER**

Thema S.r.l.  
Via Saragat, 5 40026 Imola (BO) VAT No. 02770361208  
Telephone +39. 0542.643496 Email: [info@thema-med.com](mailto:info@thema-med.com);

### **FINALITY OF DATA PROCESSING**

1. Functioning of the website:
  - Any requests made by users;
  - User session saving;
  - Activities necessary for the operation of the site;
2. Security in web browsing:
  - Actions to protect the site in case of harmful events;
3. Facilitating the navigation of website users:
  - Reuse of anonymous cookies in the same browsing session of the user;
  - Facilitate the consultation of the site with the use of third-party cookies;
  - Use of technical, analytics and third-party cookies and social network plugins;
4. Statistics:
  - Browsing statistics on anonymous data;

### **PERSONAL DATA PROCESSING METHODS**

1. Data shall be processed in accordance with the principles of lawfulness, correctness and transparency respecting the privacy, dignity and rights of interested parties;
2. Data are processed with electronic devices and on paper in compliance with appropriate technical organizational measures referred to in Art. 29 GDPR 679/16 EU;
3. Data shall be processed, in accordance with the principles of necessity and proportionality by authorized entities appropriately trained within the structure;
4. External entities authorized to process data are configured as joint controllers, managers, designated or authorised according to the type and mode of access. The requirements of such entities shall be verified in advance and the implementation of the necessary and appropriate technical organizational measures shall be regularly monitored;

## **LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA**

The processing of personal data is based on specific legal bases provided by the GDPR 679/16 EU detailed below:

1. For reasons of necessity relating to the execution of a contract (purpose of operation of the site and request or sending of information spontaneously by the interested party through contact “form”) to which the person concerned is a party or for the implementation of pre-contractual measures taken at the latter’s request;
2. For the legitimate interest of the Data Controller (purpose of security in web browsing, purpose of user facilitation on the website, statistical purposes);
3. The site does not use cookies for profiling purposes;

## **NATURE OF DATA PROVISION**

1. The processing of data is mandatory with regard to the purpose of the website’s operation;
2. The processing of data is mandatory with regard to the purpose of security in web browsing;
3. The processing of data is optional for the purposes of user facilitation on the website. Users have the right to act on the settings of their browser use to decide whether or not to accept cookies during navigation;

Links to the disabling tools of the main browsers below:

[Mozilla Firefox](#) - [Windows Internet Explorer](#) - [Google Chrome](#) - [Opera](#) - [Apple Safari](#)

## **INFORMATION COLLECTED BY THE DATA CONTROLLER**

The information collected and the purpose for which is requested are described below:

### **1. Technical cookies.**

Technical cookies are those used for the sole purpose of "transmitting a communication over an electronic communications network and they are not used for other purposes. They are installed directly by the owner or manager of the website. They can be divided into navigation or session cookies, that guarantee normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access restricted areas); cookie analytics, assimilated to technical cookies to collect information, in aggregate form, on the number of users and on how they visit the site;

### **2. Third-party cookies.**

By visiting the website you can receive technical cookies of “third-parties” managed by other organizations. These are parts of the page visited directly generated by these sites and integrated in the host site page. The use is aimed at the use of services requested. The presence of these plugins involves the transmission of cookies to and from all sites managed by third parties. The management of the information collected by “third parties” is governed by the relevant information to which we ask you to refer. To ensure greater transparency and convenience, web addresses of the different information and methods for managing cookies are reported below;

### **3. Statistical cookies**

Services content in this section allow the Data Controller to monitor and analyze traffic data and they are used to keep track of the user’s behavior anonymously;

## **RECIPIENTS OF THE INFORMATION**

1. Data will not be circulated, they may also be transferred to third parties belonging to the categories described

below:

- External entities identified by the Data Controller as Joint Controllers, Managers or Independent Data Controllers in the field of website management and technical assistance or within the management of applications accessible through the site;
- Public entities authorized for regulatory provisions;
- Internal entities authorised to process personal data for the provision of the requested service;
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### **TRANSFER OF INFORMATION OUTSIDE THE EU**

1. Personal data are not subject to transfer to foreign countries of the European Union or outside the EU. Any eventual transfer would take place in compliance with Articles 45, 46 of the GDPR 679/16 EU;

### **STORAGE OF PERSONAL DATA**

1. Session cookies (not persistent) are kept limited to the browsing session and they are automatically deleted when the session is closed;
2. Persistent cookies are kept for a period not exceeding 36 months and then deleted. However, browsing the site, you can interact with third-party sites that can create or modify permanent and profiling cookies;
3. Statistical cookies are kept for an unlimited time in anonymous form;
4. Users can decide whether or not to accept cookies using the settings of their browser. The usability of public content is also possible by disabling cookies. The disabling of “third parties” cookies does not affect in any way the navigability. The setting can be defined specifically for different websites and web applications. In addition, the best browsers allow you to define different settings for cookies “owners” and of “third parties”.

### **RIGHTS OF THE DATA SUBJECT**

1. The rights of the data subject (art. from 15 to 22) provide for the possibility to:
  - a) Ask the Data Controller for access to personal data and to information concerning the purposes of the processing, to the categories of personal data processed, to the recipients or categories of recipients to whom the data are communicated and access to the data retention period
  - b) Ask the Data Controller the rectification of personal data
  - c) Ask the Data Controller the erasure of personal data
  - d) Ask the Data Controller the limitation of the processing of personal data
  - e) Ask the Data Controller the portability of personal data
  - f) Object to the processing of personal data in the cases provided for
  - g) Object to automated decision-making processes related to personal data, including profiling
  - h) Exercise withdrawal of consent to the processing of personal data in the cases provided for
  - i) Lodging a complaint with a supervisory authority

The detailed description of the rights of the data subject can be consulted on the Regulation for the protection of personal data GDPR 679/16 EU Art. from 15 to 22;