

## Privacy Policy under Regulation (EU) 2016/679 no. 679/2016 ("GDPR")

### A. Who are we and why are we providing you with this document?

EUROIMMUN ITALIA s.r.l., a sole shareholder company, has for many years prioritised the protection of the personal data of its current and/or potential customers and users, ensuring that the processing of personal data, regardless of how it is performed, be it automatically or manual, is fully compliant with the protections and rights put forward by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter the 'Regulation'), and by the further applicable rules on the protection of personal data.

The term "personal data" refers to the definition contained in Article 4(1) of the Regulation, i.e. "any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity" (hereinafter "Personal Data").

The Regulation provides that, before processing Personal Data - by which is meant, according to the definition contained in Article 4(2) of the Regulation, "any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage adaptation or modification, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction" (hereinafter referred to as the "Processing") - it is necessary that the person to whom such Personal Data belong is informed about the reasons why such data are required and how they will be used.

In this regard, the purpose of this document is to provide a simple and intuitive overview of all the useful and necessary information required to ensure that your Personal Data is provided in an aware and informed manner and that you may, at any time, request and obtain clarifications and/or rectifications.

This section includes information related to how the website [www.euroimmun.it](http://www.euroimmun.it) is managed, with specific reference to how EUROIMMUN ITALIA s.r.l., a sole shareholder company, processes the users' data.

1. This privacy policy is also valid for the purposes of Article 13 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, for individuals interacting with EUROIMMUN ITALIA s.r.l., a sole shareholder company; this privacy policy is available at the home page address: [www.euroimmun.it](http://www.euroimmun.it).
2. The privacy policy is solely applicable to the website [www.euroimmun.it](http://www.euroimmun.it) and shall not apply to other websites that may be consulted by the user through the links contained therein.
3. The purpose of this document is to provide information on the means, times and nature of the information that the data controller must provide to users when the latter connect to the web pages of EUROIMMUN ITALIA s.r.l., a sole shareholder company, regardless of the purposes of said connection, according to the Italian and European legislation.
4. The Privacy Policy may be subject to changes as a result of the introduction of new regulations in this regard: therefore, users are invited to periodically check this page.

If you are under sixteen years of age, in accordance with Art. 8, c. 1 Regulation (EU) 2016/679, your consent will have to be validated by means of your parents' or legal guardian's authorisation.

If necessary, this Privacy Policy may be accompanied by a consent form as provided for in Article 7 of the Regulation, drafted depending on the additional use we intend to make of your Personal Data.

### B. Who will process your Personal Data?

The company that will process your Personal Data for the main purpose set out in Section D of this Privacy Policy and that will therefore act as Data Controller according to the definition contained in Article 4(7) of the Regulation ("the natural or legal person,

public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data”) is:

EUROIMMUN ITALIA s.r.l., a sole shareholder company, headquartered in Corso Stati Uniti, 4 scala F - 35127 Padova (PD), Tax and VAT Code 03680250283

(hereinafter the “Data Controller”)

For certain processing operations identified in Section E below, the Data Controller will be supported by the following companies, which will act as co-processors, meaning “two or more companies that jointly determine the purposes and means of the processing” as provided for in Article 26 of the Regulation.

### **C. Who can you contact?**

In order to facilitate the relationship between you, the data subject, i.e. the “identified or identifiable natural person” to whom the Personal Data refer according to article 4(1) of the Regulation (hereinafter the ‘Data Subject’) and the Data Controller, you may freely contact the Data Controller for all issues related to the Processing of your Personal Data and/or should you wish to exercise your rights as provided for by Section I of this Privacy Policy, by sending a written notice to the e-mail address [privacy@euroimmun.it](mailto:privacy@euroimmun.it) and/or by writing to the Data Controller EUROIMMUN ITALIA s.r.l. a sole shareholder company, Corso Stati Uniti, 4 scala F - 35127 Padova (PD) and/or by calling the telephone number +39 049 7800178.

The ‘Privacy’ section of the website may be consulted at any time: there you will find all the information concerning the use and processing of your Personal Data, the Company’s detailed references, updated information on the contacts and communication channels made available to all Data Subjects by the Data Controller.

### **D. For what main purpose will your Personal Data be processed?**

To allow you to register to its website, if the option is provided to register, and/or to send requests for information using the contact forms, and/or to subscribe to the newsletter service, the Data Controller needs to collect some of your Personal Data, as requested in the registration form on the website. The Data Controller’s website - for which this Privacy Policy is issued - is the website stated in the company’s Privacy Policy that can be consulted at the link <https://www.euroimmun.it/legal/informativa-privacy/> (hereinafter the ‘Website’). The Processing of your Personal Data will be conducted by the Data Controller in order to allow you to access your profile, receive newsletters, send information requests; the Processing of your Personal Data will be legally based on the contractual relationship that will be created between you and the Data Controller following your acceptance of the terms and conditions in the Website.

To allow the Data Controller to carry out the Processing activities for the above purposes, you will be asked to provide the Personal Data marked with the symbol “\*”. Should even one of the marked data be lacking, it will not be possible to proceed with the Processing of your Personal Data and, consequently, you will not be allowed to complete your registration on the Websites and/or benefit from the services provided by the Website for which the provision of Personal Data is required.

The Personal Data that you will be asked to supply for the purposes stated above are be those stated in the registration and/or contact form, i.e., by way of example but not limited to: first name, last name, username, date of birth, address of domicile/residence, e-mail address, telephone numbers of landlines and/or mobile phones, tax code. If you decide to access the Website using your social profile (e.g. Facebook profile), where applicable, your Personal Data will be collected by the Data Controller from third parties, i.e. from the manager of the social network you used to access the Website. In this case, you will be able to view this Privacy Policy in the Privacy section of the Site.

### **E. To whom may we disclose your Personal Data**

Your Personal Data may be disclosed to specific individuals who are considered recipients of such Personal Data. Indeed, Article 4 item 9) of the Regulation defines the recipient of Personal Data as “the natural or legal person, public authority, service or other body receiving communication of personal data, whether or not a third party” (hereinafter referred to as the “Recipients”).

In view of the above, in order to properly carry out all the Processing activities necessary to pursue the purposes set out in this Privacy Policy, the following Recipients may be in a position to process your Personal Data:

- third parties who execute part of the Processing activities and/or activities connected and instrumental thereto on behalf of the Data Controller or of the Joint Data Controllers. Such entities are appointed as data controllers, and with this expression are jointly understood, pursuant to Article 4(8) of the Regulation, as “the natural or legal person, public authority, service or other body that processes Personal Data on behalf of the Data Controller” (hereinafter the ‘Data Controller’);
- individuals, employees and/or contractors of the Data Controller or of the Joint Data Controllers, who have been entrusted with specific and/or multiple Processing activities on your Personal Data. Such individuals have been given specific instructions on the security and proper use of Personal Data and are defined, pursuant to Article 4(10) of the Regulation, as ‘persons authorised to process Personal Data under the direct authority of the Controller or the Processor’ (hereinafter the ‘Authorised Persons’).
- Whenever required by law or for the purpose of preventing or suppressing a criminal offence, your Personal Data may be disclosed to public bodies or judicial authorities without them being defined as Recipients. Indeed, according to Article 4(9) of the Regulation, “public authorities that may receive communication of Personal Data in the context of a specific investigation in accordance with Union or Member State law are not considered to be Recipients”.

#### **F. For how long will your Personal Data be processed?**

One of the principles applicable to the Processing of your Personal Data relates to the limitation of the conservation period, which is governed by Article 5(1)(e) of the Regulation, which states that “Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than it is necessary for the purposes for which it is processed; Personal Data may be conserved for longer periods, provided that they are processed solely for archiving purposes in the public interest or for scientific or historical research or statistical purposes in accordance with Article 89(1), subject to the implementation of appropriate technical and organisational measures required by this Regulation to protect the rights and freedoms of the Data Subject”.

In compliance with this principle, your Personal Data will be processed by the Data Controller only to the extent necessary for the fulfilment of the purpose set out in Section D of this Privacy Policy. In particular, your Personal Data will be processed for a period of time equal to the minimum necessary, as indicated in Recital 39 of the Regulation, that is until the termination of the existing contractual relationship between you and the Data Controller without prejudice to an additional storage period that may be imposed by law as also provided for in Recital 65 of the Regulation.

#### **G. Can I withdraw my consent and how?**

As provided for by the Regulation, if you have consented to the Processing of your Personal Data for one or more of the purposes for which they requested, you may, at any time, withdraw your consent fully and/or in part without affecting the lawfulness of the Processing based on the consent given before the withdrawal.

The procedures for revoking one’s consent are extremely simple and intuitive; all you need to do is contact the Data Controller using the contact channels provided respectively in this Policy and in section C.

#### **H. What are your rights?**

As provided for in Article 15 of the Regulation, you may access your Personal Data, request its rectification and update if incomplete or erroneous, request its erasure if it was collected in contrast with a law or regulation, and object to the Processing for legitimate and specific reasons.

More specifically, the following is a list of all the rights that you may exercise, at any time, vis-à-vis the Data Controller:

- Right to access: pursuant to Article 15(1) of the Regulation, you have the right to obtain from the Controller confirmation as to whether or not your Personal Data is being processed and, if so, to obtain access to such Personal Data and to the following information: (a) the purposes of the Processing; (b) the categories of Personal Data concerned; (c) the

Recipients or categories of Recipients to whom your Personal Data has been or will be disclosed, in particular if Recipients from third countries or international organisations; d) where possible, the expected period of retention of Personal Data or, if this is not possible, the criteria used to determine this period; e) the existence of the Data Subject's right to request from the Data Controller the rectification or erasure of Personal Data or the restriction of the Processing of Personal Data concerning him/her or to object to the Processing of Personal Data f) the right to lodge a complaint to a supervisory authority; g) if the Personal Data were not collected from the Data Subject, all available information on their origin; h) the existence of an automated decision-making process, including profiling as referred to in Article 22(1) and (4) of the Regulation and, at least in such cases, significant information on the logic used, as well as the importance and the foreseen consequences of such Processing for the Data Subject. All this information can be found in this Information Notice, which will always be available to you in the Privacy section of each Website.

- Right to rectification: pursuant to Article 16 of the Regulation, you may obtain the rectification of your Personal Data that is inaccurate. Taking into account the purposes of the Processing, you may also obtain the integration of your incomplete Personal Data, also by providing a supplementary declaration.
- Right to erasure: pursuant to Article 17(1) of the Regulation, you may obtain the erasure of your Personal Data without undue delay and the Data Controller shall be obliged to erase your Personal Data if any of the following reasons apply (a) the Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) you have withdrawn the consent on which the Processing of your Personal Data is based and there is no other legal basis for the Processing of your Personal Data; (c) you have objected to the Processing pursuant to Article 21(1) or (2) of the Regulations and there is no longer any overriding legitimate reason for processing your Personal Data; (d) your Personal Data has been unlawfully processed; (e) it is necessary to erase your Personal Data in order to comply with a legal obligation laid down by an EU or national law. In some cases, as provided for in Article 17(3) of the Regulation, the Data Controller is entitled not to delete your Personal Data if the processing of your Personal Data is necessary, for example, to exercise the right to freedom of expression and information, to comply with a legal obligation, for reasons of public interest, for archiving in the public interest, for scientific or historical research or statistical purposes, for the establishment, exercise or defence of legal claims.
- Right to restrict processing: you may obtain the restriction of the Processing, pursuant to Article 18 of the Regulation, should one of the following cases occur: (a) you have contested the accuracy of your Personal Data (the restriction will last for the period necessary for the Data Controller to verify the accuracy of such Personal Data); (b) the Processing is unlawful but you have objected to the deletion of your Personal Data, requesting instead that its use be restricted; (c) although the Data Controller no longer needs your Personal Data for the purposes of the Processing, your Personal Data is needed for the establishment, exercise or defence of legal claims; (d) you have objected to the Processing pursuant to Article 21(1) of the Regulation and are awaiting verification as to whether the Data Controller's legitimate reasons prevail over yours. If the Processing is restricted, your Personal Data will be processed, except for storage, only with your consent or for the establishment, exercise or defence of legal claims or to protect the rights of another natural or legal person or for reasons of substantial public interest. We will, in any event, inform you before such restriction is lifted.
- Right to data portability: you may, at any time, request and receive, pursuant to Article 20(1) of the Regulation, all of your Personal Data processed by the Data Controller and/or the Joint Data Controllers in a structured, commonly used and readable format or request its transmission to another data controller without hindrance. In this case, it will be your responsibility to provide us with the exact details of the new controller to which you intend to transfer your Personal Data by providing us with written authorisation.
- Right to object: in accordance with Article 21(2) of the Regulation and as also reiterated in Recital 70, you may object, at any time, to the Processing of your Personal Data if it is processed for direct marketing purposes, including profiling, insofar as it is related to such direct marketing.
- Right to lodge a complaint with the supervisory authority: without prejudice to your right to appeal to any other administrative or judicial authority, if you consider that the Processing of your Personal Data carried out by the Data Controller and/or the Data Processors is in breach of the Regulation and/or applicable law, you may lodge a complaint with the competent Data Protection Authority.

To exercise all your rights, as identified above, simply contact the Data Controller and/or the Joint Data Controllers as follows:

Send a written notice to the e-mail address [privacy@euroimmun.it](mailto:privacy@euroimmun.it) and/or by write to the Data Controller EUROIMMUN ITALIA s.r.l. a sole shareholder company, Corso Stati Uniti, 4 scala F - 35127 Padova (PD) and/or call the telephone number +39 049 7800178

## I. Where will your Personal Data be processed?

Your Personal Data will be processed by the Data Controller and/or the Joint Data Controllers within the territory of the European Union. If for technical and/or operational reasons it is necessary to use subjects located outside the European Union, we hereby inform you that such subjects will be appointed as Data Processors pursuant to and for the purposes of Article 28 of the Regulation and the transfer of your Personal Data to such subjects, limited to the performance of specific Processing activities, will be regulated in accordance with Chapter V of the Regulation. Therefore, all necessary precautions will be taken in order to ensure the most complete protection of your Personal Data by basing such transfer: (a) on the declaration of the suitability of the receiving third countries expressed by the European Commission; (b) on adequate safeguards expressed by the receiving third party pursuant to article 46 of the Regulation; (c) on the adoption of corporate binding rules.

## COOKIES

### Types of cookies

1. The [www.euroimmun.it](http://www.euroimmun.it) website uses cookies to make the user's browsing experience easier and more intuitive: cookies are small text strings used to store certain information that may relate to the user, his or her preferences or internet access device (computer, tablet or mobile phone) and are mainly used to adapt the operation of the site to the user's expectations, offering a more personalised browsing experience and storing the choices made previously.
2. A cookie consists of a small set of data transferred to the user's browser by a web server and can only be read by the server that carried out the transfer. It is not an executable code and does not spread viruses.
3. Cookies do not record any personal information and any identifiable data will not be stored. If you wish, you can prevent the saving of some or all cookies. However, in this case, your use of the website and the services offered may be impaired. To proceed without changing your cookie options, simply continue browsing.

The website uses the following cookies:

### Technical cookies

1. Numerous technologies are used to store information on the user's computer, which is then collected by other sites. Of these, HTML is the best known and most broadly used. They are used for browsing purposes and to facilitate the user's access and use of the site. They are needed to send communications over electronic networks or for the provider to provide the service requested by the customer.
2. The settings for managing or deactivating COOKIES may vary depending on the Internet browser used. In any case, the user can manage or request the general deactivation or deletion of cookies by modifying the settings of their internet browser. Such deactivation may slow down or prevent access to certain parts of the site.
3. The use of technical cookies enables the safe and efficient use of the website.
4. The COOKIES that are added to the browser and retransmitted by Google Analytics or by the statistics service of bloggers or similar are technical only if they are used for site optimisation purposes directly by the website's owner, who may collect information, in aggregate form, on the number of users and how they visit the site. Under these conditions, the same rules, regarding information and consent provided for technical cookies apply to Analytics COOKIES.
5. In terms of time, a distinction can be made between temporary session cookies that are automatically deleted at the end of the browsing session, used to identify the user and therefore avoid logging in on each page visited, and permanent cookies that remain active on the computer until they expire or are deleted by the user.
6. Session cookies may be installed to allow access and to remain in the reserved area of the portal as an authenticated user.

7. They are not stored permanently but exclusively for the time of the browsing until the browser is closed and disappear when the browser is closed. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server, which are necessary to allow secure and efficient exploration of the site.

### Third-party cookies

1. As to origin, a distinction is made between cookies sent to the browser directly from the site you are visiting and third-party cookies sent to your computer from other sites and not from the one you are visiting.
2. Persistent cookies are often third-party cookies.
3. Most third-party cookies are tracking cookies used to detect online behaviour, understand interests and thus personalise advertising propositions for users.
4. Third-party analytical cookies may be installed. These are sent from third party domains outside the site.
5. Third-party analytical cookies are used to collect information about user behaviour on [www.euroimmun.it](http://www.euroimmun.it). The collection is done anonymously and aims to monitor the performance and improve the usability of the site. Third-party profiling cookies are used to create profiles of the users of [www.euroimmun.it](http://www.euroimmun.it), in order to propose advertising messages in line with the choices made by users.
6. The use of these cookies is governed by the rules laid down by the third parties themselves. Therefore, users are invited to read the privacy notices and the instructions for managing or disabling cookies published on the relevant web pages.

### Profiling cookies

1. Profiling cookies create user profiles and are used to send advertising messages in line with the preferences expressed by the user when surfing the web.
2. The user must explicitly consent to this type of COOKIE.
3. Article 22 of the EU Regulation 2016/679 and Article 122 of the Data Protection Code shall apply.

## DATI TRATTATI

### 1. Data processing method

1. This type of information is subjected to an automated test rate and is collected exclusively in an aggregate form in order to verify that the site is functioning correctly and for security reasons. This information will be subject to a test rate according to the legitimate interests of the owner.

Like all websites, also this website makes use of log files that store the information collected automatically during user visits. The information collected may include:

- Internet Protocol (IP) address;
- Type of browser and parameters of the device used to connect to the site;
- Name of the anonymous service provider (ISP);
- Date and time of visit;
- Visitor's webpage of origin (referral) and exit;
- Number of clicks, if any.



2. This type of information is subjected to an automated test rate and is collected exclusively in an aggregate form in order to verify that the site is functioning correctly and for security reasons. This information will be subject to a test rate according to the legitimate interests of the owner.
3. For security purposes (antispam filters, firewalls, virus detection), the automatically recorded data may possibly also include personal data such as the IP address, which could be used, in accordance with the relevant laws in force, to block attempts to damage the site itself or to cause damage to other users, or activities that are harmful or constitute a crime. These data will never be used for user identification or profiling, but only for the purpose of protecting the site and its users; this information will be used according to the legitimate interests of the owner.
4. If the website allows the posting of comments, or in the event of specific services requested by the user, including the option of sending a CV for a job position, the website automatically detects and records certain user identification data, including the user's e-mail address. These data are understood to have been provided voluntarily by the user when requesting the service. By entering a comment or other information, the user expressly accepts the privacy policy and, in particular, consents to the contents entered being freely disclosed to third parties. The data received will be used exclusively for the provision of the service requested and only for the time necessary for the provision of the service.
5. The information that the website's users decide to make public through the services and tools made available to them, is provided by the user knowingly and voluntarily, exempting this site from any liability for any violations of the law. It is up to the user to verify that he or she has the permissions to enter personal data of third parties or content protected by national and international regulations.

#### **Data provided by the user**

1. As stated above, the optional, explicit and voluntary sending of electronic mail to the addresses shown on this website entails the subsequent acquisition of the sender's address, which is necessary to reply to requests, as well as any other personal data included in the message.
2. Specific summary information will be progressively reported or displayed on the website's pages set up for specific on-demand services.

#### **Support for configuring your browser**

1. You can also manage cookies through your browser settings. However, deleting cookies from your browser may remove the preferences you have set for the website. For further information and support you can also visit the specific help page of the web browser you are using:
  - [Internet explorer](#)
  - [Edge](#)
  - [Firefox](#)
  - [Safari](#)
  - [Chrome](#)
  - [Opera](#)

#### **Social Network Plugins**

1. This website also incorporates plugins and/or buttons for social networks in order to allow content to be easily shared on your favourite social networks. These plugins are programmed so as not to set any cookies when you access the page, in order to safeguard your privacy. Cookies are only set, if at all, by social networks when the user makes an actual and voluntary use of the plugin. Please bear in mind that if the user browses while logged into the social network then he/she has already consented to the use of cookies conveyed through this site at the time of registration with the social network.

2. The collection and use of information obtained by means of the plugin are governed by the privacy policies of the respective social networks, to which reference should be made:
  - Facebook: <https://www.facebook.com/help/cookies>
  - X: <https://help.x.com/it/rules-and-policies/x-cookies>
  - Pinterest: <https://about.pinterest.com/it/privacy-policy>
  - LinkedIn: <https://www.linkedin.com/legal/cookie-policy>

## SECURITY OF THE DATA PROVIDED

1. User data are processed by this website in a lawful and correct manner, adopting appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of data. Processing is carried out by means of computer and/or telematic tools, with organisational methods and logic strictly related to the purposes stated.
2. In addition to the Data Controller, there are some cases in which certain categories of people involved in the organisation of the website (administrative, marketing, commercial, legal, system administration staff) or external subjects (such as third-party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) may have access to the data.

## AMENDMENTS TO THIS DOCUMENT

1. This document, published at: <http://www.euroimmun.it/about/about-us/privacy/> constitutes the Privacy Policy of this website.
2. It may be subject to changes or updates. In the event of significant changes and updates, these will be notified to users.
3. This document, compliant to the relevant legal provisions and in particular with Regulation (EU) 2016/679, was updated on 27/06/2025.