



Information notice pursuant to article 13 of EU Regulation 679/2016 and to the Italian legislation on personal data protection – Pharmacy Orders

This Information Notice is given pursuant to article 13 of EU Regulation 679/2016 and in agreement with the Italian laws on personal data protection. According to the above legislation, the processing of the data that you provide will be performed in accordance with the principles of fairness, lawfulness and transparency, and will be adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed and according to the data minimization principle.

Data controller and Data Protection Officer

The data controller is Bruno Farmaceutici S.p.A., in the person of its legal representative pro-tempore, with registered office in Rome, Via delle Ande n. 15, 00144, Phone No. 06.60506052, email info@bruno.org, certified email (PEC) amministrazione@pec.brunofarmaceutici.it, which designated a Data Protection Officer whose contact details are: dpo@brunofarmaceutici.it.

Purposes and legal basis of the processing

Your data will be processed for the following purposes:

- a) To ensure execution of your order and/or your requests. The data you provide will be processed in order to ensure the proper and complete execution of your request, which must be submitted via email to the addresses reported in the relevant Pharmacy Order section;
- b) Based on the contents of your request, your data may be also processed to comply with tax or accounting obligations. In such cases, the data that you may provide, including but not limited to your bank details, may be collected and handled for the purpose of exercising the rights and fulfilling the obligations provided for by the law;

The legal basis of the treatment is the following:

- a. To take charge of your requests and, therefore, to carry out pre-contractual measures as requested by the interested subject;
- b. To fulfill an obligation provided for by the law, as for the processing of data that is necessary for the fulfilment of tax or accounting obligations.

Mode of processing

Your personal data will be processed with the purpose of providing the information requested and taking charge of the orders, if applicable.

Your personal data shall be processed by analogic and/or electronic means and include a set of operations concerning collection, registration and processing on paper, computer and electronic media, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, erasure or destruction.

Your data shall be processed in a manner that is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed and according to the data minimization principle, and shall be guided by the principles of lawfulness, fairness, transparency and accuracy.

Communication and dissemination of data

Your personal data shall be communicated to third parties, employees and/or collaborators acting in their capacity as subjects authorized to personal data processing, who will carry out the processing as instructed.

If you make an order, your personal data may be communicated to third parties, for example for accounting and business data processing, for tax and financial consultancy and/or for the fulfilment of legal obligations, but always in accordance with the data minimization principle and limited to what is necessary in relation to the purposes for which they are processed.

If the above subjects do not act as independent data controllers, they will be designated as Data Processors under article 28 of EU regulation 679/2016 and will act under the supervision of the undersigned Controller, ensuring adequate security measures.



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Your personal data may also be made available, for the above-described purposes:

- To Institutions and Public Bodies that have a right or obligation to access such data under any law, regulation or European legislation (including, but not limited to, social security and complementary healthcare funds, also provided by the employing company, healthcare agencies, intermediation agencies);
- To self-employed professionals who work with the Data Controller;
- To external companies acting as independent data controllers;
- To external companies designated as data processors.

Under no circumstances shall personal data be communicated, disseminated, assigned or otherwise transferred to third parties for unlawful purposes and, in any case, without providing the relative information to the Interested Parties and obtaining their consent, where required by law. This will be without prejudice to any communication of data performed to comply with requests from Judicial or Public Security authorities in the manners and under the circumstances provided for by the law, notwithstanding the privileges and professional secrecy as applicable.

Personal data will be processed in the European Union and stored on servers located in Italy or within the European Union.

Data retention period

The principles of lawfulness, fairness, transparency, accuracy, appropriateness, relevance and necessity will also apply to the retention of your personal data, which will be performed using appropriate methods to ensure security and confidentiality, with and without the aid of automated means for data storage, handling and transmission.

The controller reserves its right to retain your data as necessary to comply with legal obligations. In any case, the retention period will not exceed 10 years after conclusion of the assignment, after which the data will be erased and/or destroyed in compliance with the security measures provided to ensure confidentiality. This will occur unless retention of the data is made necessary by another condition that lawfully requires the processing without further consent.

Rights of the data subject

Under articles 15-21 of EU Regulation 679/2016, you have the following rights in relation to the personal data that you have provided:

- Access and request a copy of such data;
- Request rectification;
- Request erasure;
- Obtain limitation of processing;
- Withdraw your consent;
- Oppose to processing;
- Receive the personal data that concerns you in a structured format of common use readable by an automatic device, and transfer such data to another controller without impediments insofar as this is technically feasible.

The above-specified requests should be made via registered post to the address specified above or sent by certified electronic mail (enclosing a signed copy of ID) to amministrazione@pec.brunofarmaceutici.it; requests will be effective upon acknowledgment of receipt.

You will also have the right to lodge a complaint with the Personal Data Protection Authority (Garante per la Protezione dei Dati Personali).