

PRIVACY POLICY

We hereby inform users in accordance with Article 13 of EU Regulation 2016/679 - General Data Protection Regulation (hereinafter, "**GDPR**") about the processing of personal data carried out through this website.

The processing of personal data is carried out in accordance with current data protection legislation and is based on the principles of fairness, lawfulness, transparency and data protection.

Please note that this privacy policy refers exclusively to the personal data of those who interact with the services accessible from the home page <https://www.humanitas.eu> (hereinafter, "**Site**"), without extending to any other websites that the user may have accessed through links on the Site.

1. Data Controller

The Data Controller is **Humanitas Mirasole S.p.A.**, P. Iva 10125410158, with registered office in via Manzoni, 56 20089, Rozzano (MI), in the person of its *pro tempore* Managing Director.

2. Categories of data subjects

Humanitas Mirasole S.p.A. processes personal data of users of the Site.

3. Type of Personal data processed

Various types of personal data are processed through the Site:

3.1. Browsing Data

- Technical Data

The computer systems and software procedures used to operate this website acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. This data is used only for statistical information (therefore it is anonymous), to check the correct functioning of the Site, and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the Site, as better reported in point 5.

- Cookies

The Site collects personal data using cookies or similar technologies. For further information, please visit "[Cookie Policy](#)" of the Site.

3.2. Data provided voluntarily by the data subject

The Site provides users the possibility of providing personal information on a voluntary basis by, for example, filling in the “*Contact*” forms on the Site.

4. Services provided by the Site. Purposes of the processing, lawfull and data retention

4.1. Section “*Contact*”

Within on the Site there is a “*Contact*” section through which the user may submit his/her requests to respond to requests for information on the company itself and/or its services.

Data marked with an asterisk (*) in the data collection form must be provided to be able to provide the information requested, therefore if this information is absent the Company will not be able to process the request.

Purpose of the processing: to provide answers to user requests for informations.

Legal basis: article 6, par. 1, lett. b) GDPR, “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”.

Data retention: personal data will be kept for the time necessary to process request for information. Once the retention period has elapsed the data will be destroyed.

5. Additional data processing activities

5.1 Ascertainment, exercise and defence of rights in extrajudicial and/or judicial proceedings

The Data Controller, where necessary, reserves the right to process the personal data of Data Subjects, collected through the Site, for the purpose of ascertaining, exercising or defending its own rights in extrajudicial and/or judicial proceedings or whenever the judicial authorities exercise their jurisdictional functions.

Legal basis: article 6, par. 1, lett. f) GDPR, “processing is necessary for the purposes of the legitimate interests pursued by the controller”. In order to be able to demonstrate the lawfulness of such processing, the Data Controller has carried out a balancing of interests between the interest pursued and the rights and freedoms of the data subjects.

Data retention: personal data will be kept for the duration of the legal dispute, until the time limits for the admissibility of the appeal have expired.

6. Way of processing, recipients and purpose of communication of personal data

All data will be processed mainly in electronic format. Personal data as well as any other information that can be associated, directly or indirectly, with a specific user are collected and processed by applying technical and organisational security measures such as to ensure a level of security appropriate to the risk, taking into account the state of the art and the costs of implementation and, where applicable, security measures prescribed by specific legislation, such as, but not limited to, measures prescribed by orders issued by the Data Protection Authority or by specific rules and regulations for the health/hospital sector.

The personal data will be processed by:

- persons authorized by the Data Controller to process personal data, as employees and/or collaborators pursuant to Article 29 of the GDPR and 2-quaterdecies of the Privacy Code, who have received appropriate operating instructions, have committed to keep the data confidential or are subject to an appropriate legal obligation of confidentiality.
- subjects delegated and/or appointed by the Data Controller to carry out activities strictly related to the pursuing of specific purposes (including, but not limited to, technical maintenance operations of the Site and the services), duly appointed as Data Processors pursuant to Article 28 of the GDPR.
- subjects, bodies or authorities to whom the communication of the data subject's personal data is obligatory by force of legal provisions or orders of the competent authorities.

Subject to the above, personal data will not be disclosed and/or communicated to third parties.

7. Transfer of personal data outside the European Union

The personal data collected through this Site are not transferred outside the European Union and the European Economic Area.

Should such a transfer become necessary and/or unavoidable due to the organisational needs of the Data Controller, please note that

- will only be made to countries in respect of which there is an adequacy decision adopted by the European Commission;
- if it occurs in a country other than the one for which an adequacy decision referred to in the preceding paragraph has been issued, the transfer of data shall be governed by the Standard Contractual Clauses without prejudice to the adoption, subject to the agreement of the Parties involved, of another of the safeguards set out in Article 46 of the GDPR or the application of one of the derogatory mechanisms set out in Article 49 of the GDPR.

8. Data Subject rights and DPO contact details

In relation to the processing of personal data carried out through this Site, the data subject may at any time know the data concerning him/her, find out how they were acquired, check whether they are accurate, complete, up-to-date and well kept, assert the rights recognised to him/her by Art. 15 et seq. GDPR (right of access to data, right to rectification or erasure of data, right to limitation of or opposition to data processing, right to data portability, right to withdraw consent), by filling in the dedicated form on the website www.humanitas.it/privacy or by writing to privacy@humanitas.it or privacy.humanitas@pec.it.

For any further data protection activities, please refer to the Data Protection Officer (DPO), via Manzoni 56 20089 Rozzano (Milan), e-mail: dataprotectionofficer@humanitas.it.

If the data subject notices a violation of the law in the processing of his/her personal data, he/she has the right to lodge a complaint with the Italian Data Protection Authority, pursuant to article 77 of the GDPR. However, the possibility of appealing before the competent judicial authority remains unaffected.

For further information on data protection rights and regulations in general, please visit the website of the Italian Data Protection Authority at <http://www.garanteprivacy.it/>.

9. Updates

This Privacy Policy should be subject to updates. Users are therefore invited to periodically check their content.

