

## **Privacy policy under articles 13 and 14 of EU Regulation 679/2016**

### **Premise**

The EU Regulation 679/2016 (hereinafter, "**GDPR**") aims to ensure that the processing of personal data is carried out in compliance with fundamental rights and freedoms and the dignity of the data subject, with particular reference to confidentiality and the right to data protection.

Under GDPR "processing" means any *"operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction"*.

In accordance with GDPR, Fondazione Istituto Nazionale di Genetica Molecolare - INGM with registered office in Milano (MI), Via Francesco Sforza, 35, Fiscal Code and Vat Number 04175700964 (hereinafter, "**Foundation**" or "**Data Controller**"), informs you that will process your company's employees, legal representatives and collaborators personal data with whom the Foundation will come into contact during the execution of the business relation between the parties (hereinafter, "**Data**") for the purposes set out below.

### **1. Purposes and lawfulness of data processing:**

- a) to perform his contractual obligations according to art. 6.1, letter b) of GDPR;
- b) to implement obligations under current legislation, according to art. 6.1, letter c) of GDPR.

### **2. Consequences of any refusal to respond**

The provision of the Data for the purposes referred to in the previous paragraph is mandatory, since it is strictly functional for the performance by the Data Controller of its contractual obligations towards the company for which the data subject works. Any refusal to such processing, therefore, will not allow the proper performance of the Data Controller's contractual obligations.

### **3. Manner of data processing and communication of personal data**

The Data will be processed through computerized, automated manual systems, with logic strictly related to the purposes outlined above and, in any case, by persons authorized to perform these tasks, properly aware of the constraints imposed by the GDPR, equipped with security measures aimed to ensure the confidentiality of personal data and to prevent unauthorized access to third parties or unauthorized personnel.

The Data may be communicated, to the extent strictly necessary for the purposes referred to in paragraph 1, to employees, collaborators, professionals and companies in charge of specific processing, to accounting firms and consultants in charge of keeping the accounts, to banks, to third-party bodies/associations which collaborates with the Foundation, to third-party suppliers. These suppliers, if operating in non-EU countries, offer their services on the basis of standard contractual clauses or on the basis of adequacy decisions adopted by the European Commission. These subjects will process the personal data necessary for the performance of their functions and may use these data only for the purpose of performing these services on behalf of the Data Controller or to comply with legal requirements. The Data may also be communicated to police bodies, judicial authorities, and individuals who can access them under law or secondary or European legislation.

The Data Controller undertakes to process the Data in compliance with the provisions of the GDPR, as well as current national legislation on privacy matter, and to process the Data in a lawful and correct manner, collecting and recording them for specific, explicit and legitimate purposes, ensuring that they are relevant, complete and not excessive in relation to the purposes for which they are collected or subsequently processed.

#### **4. Data retention**

The processing will last only for such period of time that is necessary for achieving the purposes mentioned at the previous paragraph 1, even by automated means. The Data Controller will then store the Data only in compliance with the legal obligations provided by the applicable laws, and/or for defensive purposes.

#### **5. Data subject's rights**

As per Articles 15 et seq. of GDPR, each data subject has the right to receive from the data controller information on the existence of the processing of his/her personal data, on the data retention period as well as to access his/her own data, to obtain a copy of his/her data, the rectification, integration, updating, erasure of such data.

The data subject will also have the right to obtain the limitation of the processing, to oppose against processing, as well as the right to receive his personal data in a structured, commonly used and machine-readable format.

In order to exercise the aforementioned rights, it is necessary to write to the Data Protection Officer at the following e-mail address [rp@ingm.org](mailto:rp@ingm.org) and/or to the Data Controller at the following e-mail address [privacy@ingm.org](mailto:privacy@ingm.org) specifying "Privacy – exercise of the data subject rights" as object.

The data subject has the right to bring a complaint with the Italian supervisory authority and/or any other competent supervisory authority.

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This privacy notice was updated on 11-09-2018. Updates in case will be always published on this page.