






WEBSITE USERS PRIVACY POLICY
PURSUANT TO ARTICLES 13 AND 14, RECITALS 60-62, EU GENERAL DATA PROTECTION
REGULATION 2016/679 (EU-GDPR)


	DATA CONTROLLER	<p>Lincotek Trento S.p.A. Address of its Registered office and Administrative headquarters: Via al Dos de la Roda 60, 38057 Pergine Valsugana, Trento (TN) Italy Phone: +39 0461 518901 Fax: +39 0461-518922 Mail: medical.EMEA@lincotek.com Certified e-mail address: medical.TN@pec.lincotek.it VAT number, Tax Code and ITVAT: IT 01305350223 Economic Administrative Index No.: TN - 129060 Paid-up Share Capital € 1.806.000,00</p> <p>www.lincotekmedical.com privacy@lincotek.com</p> <p>Business sector and activities:</p> <ul style="list-style-type: none">• Treatment and coating of metals. Provision of special services for the orthopaedic industry. (Medical)
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	<p>WEB PAGES - MISSION</p> <p>www.lincotek.com owned by Lincotek Rubbiano S.p.A., aims to transparently and clearly provide the Users with detailed and specific information on Lincotek Group S.p.A. products and services to suit all requirements, in particular on those products and services offered by its product Strategic Business Unit (SBU) namely Surface Solutions (www.lincoteksurfacesolutions.com), Equipment (www.lincotekequipment.com), Additive (www.lincotek.com/additive/) and Medical (www.lincotekmedical.com), web pages owned by Lincotek Rubbiano S.p.A., undertakings belonging to the same group (Lincotek Group S.p.A.).</p> <p>The User has arrived at these web pages via an advertisement on the internet or via an informational or promotional communication, upon prior specific consent given to:</p> <ul style="list-style-type: none">• each product SBU, namely Surface Solutions, Equipment and Medical Business Units (autonomous Data Controllers);• As regards the product Additive, Lincotek Group S.p.A. will disclose the User's personal data to the Surface Solution and Medical Business Units, as these latter are involved in the manufacturing and distribution of the product Additive (joint Data Controllers after data transfer);• one of our suppliers (Lead or List Provider) for the purpose of being contacted for commercial communications by Third parties, also for products and/or services other than those for which the consent was given. <p>The User can:</p> <ul style="list-style-type: none">• Be constantly kept up to date regarding the offered services and products;• Request information free of charge and/or sales quotes for our products by filling out the dedicated contact form;• Be contacted by experts in the field, so that the User's application may be passed on to the relevant recipient that can better deal with it and provide the necessary information. <p>The User can also contact the company by sending an email to the email address specified on the website Contact us page.</p>
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	<p>PRINCIPLES</p> <p>One of our main goals is to protect personal data. Personal data are processed lawfully, fairly and in a transparent manner, and they shall be adequate, relevant and limited to the minimum necessary and, where necessary, kept up to date and collected for specified, explicit and legitimate purposes pursuant to Articles 5 and 6 of EU General Data Protection Regulation 2016/679 (GDPR) following consent if so required.</p> <p>Personal Data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, and against accidental loss, destruction or damage, by taking suitable technical and organisational measures (Integrity and Confidentiality).</p> <p>In case of substantial modification to this Privacy Policy and to the related data processing the User shall be informed and shall have the right to decide whether or not to continue to use our services.</p>
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	<p>SOURCES OF PERSONAL DATA</p> <p>Personal data collected from the Data Subject:</p> <ul style="list-style-type: none"> • Web pages and/or Social Media Profiles of the Data Controller. <p>Personal data NOT collected from the Data Subject:</p> <ul style="list-style-type: none"> • Web pages and/or Social Media Profiles of Suppliers - Lead Providers; • Private databases (Purchase / Rental from Suppliers-List Providers, etc.); • Public databases (international public IP addresses etc.); • Internet / Search engines / Social Networks.
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	<p>CATEGORIES OF DATA SUBJECTS</p> <ul style="list-style-type: none"> • Users: legal persons and other professionals, including the personal data of the workers and persons treated as such, corporate representatives, shareholders of the companies that are already customers of ours or potential ones.
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	<p>CATEGORIES AND PERSONAL DATA PROCESSED WEBSITE</p> <p>COMMON PERSONAL DATA:</p> <p>Personally identifiable information, contact details and other information: Name and Surname, Company Name, Country, City, Phone, E-mail address, Occupation and Capacity, Reason for the request, IP, Date and Time of the recording, IMEI number, MAC ADDRESS, where applicable, and any further information associated to the Data Subject's device.</p>
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	PURPOSE OF DATA PROCESSING			DURATION OF THE PROCESSING AND DATA RETENTION PERIOD
	<p>1. Implementation of pre-contractual measures</p>	<p>Purposes connected with the imposition and implementation of pre-contractual measures (Request for information and quote):</p> <ul style="list-style-type: none"> • Information, brochure, advice, feasibility, quotations, assistance, quotation monitoring and customer satisfaction measurement, etc. • including the necessary processing of other Subjects' data whose services are used to promote, place and conclude a contract, and who are involved in the correct and complete management of requests - this data processing occurring upon prior notification to these Subjects (own Sales Network and/or Distributors and/or Agent). <p>Lawfulness of processing:</p> <ul style="list-style-type: none"> • Implementation of pre-contractual measures; • Legitimate interest; • Consent is not required. 		<ul style="list-style-type: none"> • For a period strictly necessary for the correct and complete management of the request; further processing and retention at the request of the Data subject. • Blocking/anonymisation of data once the request has been handled or after 24 months in case of Marketing consent.

<p>2. Communication between the Group companies</p>	<p>Transfer of personal data for administrative-accounting purposes, including sales within the companies of the multinational group.</p> <p>Lawfulness of processing:</p> <ul style="list-style-type: none"> • Legitimate interest of the Data Controller; • Consent is not required. 	<ul style="list-style-type: none"> • Duration of the contract (for the Data Controller). • Upon termination, data retention occurs in compliance with the legal requirements in force in the Country where data are stored (of the Recipient of the communication or Parent Company).
<p>3. Direct Marketing</p>	<p>Advertising campaigns (initiatives, events, newsletters, new products and new offers, etc.) - with traditional and automated contact methods – as well as customer satisfaction measurements and market studies.</p> <p>Lawfulness of processing:</p> <ul style="list-style-type: none"> • Consent (optional and revocable at any time); • Legitimate interest of the Data Controller: for products or services that are similar to those objects of the previous sale by writing an e-mail; Data subjects shall object to the processing of their personal data on the occasion of the first communication or of the following ones (<i>Soft Spam</i>, art. 130, paragraph 4, Privacy Code as further amended by Legislative Decree); • When there is no explicit initial refusal to consent to data processing and objection is possible at any time. 	<ul style="list-style-type: none"> • Duration of the processing and retention period up to 24 months, starting from the date on which Consent was given. • Duration of the contract (Soft Spam); • Close to the expiry of the relevant period a new request for explicit consent must be made, failing which the data processing shall be stopped / only anonymisation and statistic in aggregate form are possible.
<p>4. Indirect Marketing</p>	<p>Advertising campaigns relating to our services / products through Suppliers (Lead or List Provider) - with automated contact methods that enable to reach Forms and/or Chat of Web pages and/or Social Media Profiles of our company or of our Suppliers.</p> <p>Lawfulness of processing:</p> <ul style="list-style-type: none"> • Consent given to our Suppliers (Lead or List Provider) for the purpose of being contacted for commercial communications by Third parties, also for products and/or services other than those for which the consent was given; • Subsequent Consent given to us via our Forms and/or Web chat or to the Supplier via the Supplier's Forms and/or Web chat to be used for both giving consent or objecting to being contacted by us; • When there is no explicit initial refusal to consent to data processing and objection is possible at any time (withdrawal of consent can be done by contacting the Supplier and/or us). 	<ul style="list-style-type: none"> • Duration of the processing and retention period determined by the Suppliers; • Duration of the processing and retention period: see purposes connected with Pre-contractual Measures and/or Direct Marketing.

	<p style="text-align: center;">CONTACT METHODS FOR MARKETING PURPOSES</p> <p>Traditional contact methods:</p> <ul style="list-style-type: none"> • Telephone call to landline numbers established by operator assistance and/or traditional mail (Italy: after consultation of the Italian Public Register of Objections / Outside Italy: after checking compliance with the legislation in force in the Country where the Data subject is established); • Telephone call to mobile numbers established by operator assistance. <p>Automated contact methods:</p> <ul style="list-style-type: none"> • Fax; • Text messages (SMS); • Multimedia messages (MMS);
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- E-mails;
- Newsletters;
- Chat and messaging (WhatsApp and other similar Instant Messaging solutions);
- Targeted advertising: online advertising, through Audience segmentation (for example age, geographical location, interests, etc.).



COOKIE

Cookies are small text files that a website stores on the user's computer or mobile device when the user visits the site. Cookies are used to collect information relating to both a registered user (authenticated user) and a website visitor that accesses website pages without sending his/her credentials (unauthenticated user). Even if such information is not collected with the aim of being associated with the User's identity, it could indirectly allow identification of the User through processing and association with further data held by third parties. By combining and integrating this information, these third parties could analyse customs, preferences and usage expressed when interacting with websites. This process might also result in a user profiling process for commercial purposes. We use cookies to help users customize their browsing experience and speed up their web browsing, to increase safety, to analyse the use and efficiency of services, to allow users to make direct contact with us by using our chat service and to provide commercial information. On first login users can accept the use of cookies or, alternatively, choose to manage cookies by allowing or blocking them by selecting the dedicated tool and by clicking on the Cookie consent banner. If you want to remove or disable our cookies you can change the browser settings as described in the Cookie policy.

For more information about the different types of cookies we use and how to disable cookies please read the [Cookie Policy](#).

MONITORING OF THE COMMUNICATIONS SENT

We implement technological solutions that enable us to monitor the whole process of sending commercial or marketing communications.

Thanks to these technological tools we can deliver the same promotional communication to many recipients simultaneously by means of the above-mentioned contact methods for marketing purposes.

These technical tools also allow us to know how advertising campaigns are performing by monitoring all visitors' interactions and the storage of statistical information about the user's web navigation in anonymous and aggregate form: for example we can find out how many users clicked a link and opened the message, the content of the message that aroused the greatest interest, the users' geographical location when they sent the email, etc.



DATA RECIPIENTS

Data may be shared with and processed by external parties acting as Data Controller such as, by way of example:

Italy:

- Supervisory and monitoring Authorities and Bodies;
- Police and Judicial Authorities;
- Business transferees, transferees of a business branch, of legal relationships in bulk or of single legal relationships (for example the assignment of receivables or the transfer of contracts);
- Persons/entities providing professional consultancy services also in partnership;
- Persons/entities providing ICT services (Hosting/Data Center);
- Credit agencies to check the solvency.

European Union:

- Companies, even foreign ones, that are associated or belong to the Group or to the Parent company LINCOTEK GROUP S.P.A. (Italy), also considering the existence of telematic IT links or of correspondence (Lincotek Surface Solution – Lincotek Medical – Lincotek Equipment);
- As for the product Additive, data will be disclosed to the product Strategic Business Units Surface Solution and Medical, since these latter are involved in the manufacturing and distribution of the product;
- Persons/entities providing ICT services (Hosting/Data Center); companies within the LINCOTEK GROUP S.P.A. (Italy);
- Persons/entities providing ICT services (Hosting/Data Center);

Switzerland:

- Companies, even foreign ones, that are associated or belong to the Group or to the Parent company.

USA:

- l. Companies, even foreign ones, that are associated or belong to the Group or to the Parent company.

China:

- m. Companies, even foreign ones, that are associated or belong to the Group or to the Parent company.

Singapore:

- n. Other commercial parties authorized to distribute our products on the basis of their territorial competence corresponding to the same area to which the customer or the prospective customer belongs.

Personal data may also be processed by external parties appointed as Data Processors acting in the name and on behalf of the Data Controller. The appointed external Data Processor shall receive adequate operative instructions. The above-mentioned external parties are included in the following categories:

Italy:

- o. Persons/entities providing compliance support services on a continuous basis;
p. Persons/entities providing IT, ICT, Cloud, Web and Digital Marketing services;
q. Persons/entities providing digital and physical archiving services and electronic storage;
r. Persons/entities providing mailing services and electronic mail services;
s. Persons/entities providing market research support services;
t. Companies or professional consultants providing other services;
u. Agents and other commercial parties authorized to distribute our products and services based on their territorial competence corresponding to the same area to which the customer or the prospective customer belongs;
v. Lincotek Trento S.p.A.: Web and Digital Marketing services.

European Union:

- w. Agents or other commercial parties authorized to distribute our products on the basis of their territorial competence corresponding to the same area to which the customer or the prospective customer belongs;
x. Entities providing IT, ICT, Cloud, Web and Digital Marketing services;



OBLIGATION TO PROVIDE PERSONAL DATA

The provision of personal data is a statutory requirement necessary to enter into a contract. For this reason, failure to provide such data as well as incorrect, incomplete or inaccurate data will cause the impossibility to finalize the contract, thus leading to its termination.



PARTIES AUTHORIZED TO PROCESS THE PERSONAL DATA

Personal data may be processed by employees and collaborators in their functions, including the sales network and the people responsible for the fulfilment of the above mentioned purposes, that have been expressly authorised to process the personal data after having been informed and appropriately trained and after having received adequate operative instructions.



TRANSFER OF PERSONAL DATA TO NON-EU COUNTRIES

Personal data may be transferred to countries outside the EEA, in particular to:

- Switzerland: Level of personal data protection being considered as adequate by a decision of the European Commission (Art. 25, paragraph 6, Directive 95/46/EC and Art. 45, paragraph 3 GDPR);
- USA, China and Singapore: the Personal data of Data subjects who are outside the EU/EEA shall be transferred to other commercial parties authorized to distribute our products within their territory, specifically to those customers or potential ones located in the same geographical area;
For this reason, pursuant to Art. 3, paragraph 2 of GDPR, the European Regulation is not applicable and the personal data protection law in force in the States where the Data Recipients reside shall therefore apply.

A copy of your personal data may be obtained by following the instructions provided in the following section "[Rights of the Data subject - Lodge a complaint with a Supervisory Authority](#)".



RIGHTS OF THE DATA SUBJECT - LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

By writing an e-mail to privacy@lincotek.com, Data subjects have the right to obtain from the Data controller access to their personal data, blocking of personal data and subsequent data anonymization, as well as rectification of inaccurate personal data, completion of incomplete personal data, restriction of their processing in the cases provided for in Art. 18 of GDPR, and finally objection to data processing in the event of Legitimate interest of the Data Controller.

As regards Indirect Marketing, Data subjects can exercise their rights against us and/or the Supplier (Lead or List Provider). In order to guarantee these Rights and Claims, the Data Controller shall duly and immediately inform the Supplier about any Data Subject Access Request received by us or by the Supplier or by both, in particular when Data subjects object to processing of their personal data.

The Data Controller shall provide Data subjects with all relevant information on their requests to exercise their rights (pursuant to Articles 15 to 22 of GDPR) without undue delay and, in any case, no later than one month after the receipt of such request, as provided for by Article 12 of GDPR.

Furthermore, when processing is based on consent or on the contract and occurs by means of automatic data processing equipment, the Data subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data controller without hindrance, where technically feasible, (Right to data portability) as well as to obtain the permanent erasure of such data (Right to erasure /"Right to be forgotten").

Data subjects shall have the right to withdraw consent at any time for marketing purposes, and to object to the processing by sending an email to the email address specified above, writing the following statement in the subject header: "please erase my personal data - contact mode in use".

If Data subjects no longer want to receive further advertisements, they shall write following statement in the subject header: "please erase my personal data - marketing". In case of promotional advertising (Targeted Advertising) on websites and/or internet search engines and/or social networks, through the platform in use it is possible to know the reason why a Data subject is part of a target audience or a custom audience, in case he/she sees a promotional advertisement, and also how it is possible to get out of such audience: objection is possible at any time, consent is revocable by removing "Follow" or "Like" or "Hide ad or advertiser" in the section "Why you see this advertisement", that can be selected directly from the Promotional Post.

Where processing is based on consent for one or more than one purposes (Art. 6, Paragraph 1, Letter A of GDPR) or for processing special category data (Art. 9, Paragraph 2, Letter A of GDPR) withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Data subjects shall have the right to lodge a complaint with a Supervisory Authority of the Member State in which they are habitually resident or work, or of the place where the alleged violation took place.