






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


	<p><b>DATA CONTROLLER</b></p>	<p><b>Lincotek Trento S.p.A.</b>          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: <a href="mailto:medical.EMEA@lincotek.com">medical.EMEA@lincotek.com</a>          Certified e-mail address: <a href="mailto:medical.TN@pec.lincotek.it">medical.TN@pec.lincotek.it</a>          VAT number, Tax Code and ITVAT: IT 01305350223          Economic Administrative Index No.: TN - 129060          Paid-up Share Capital € 1.806.000,00</p> <p><a href="http://www.lincotekmedical.com">www.lincotekmedical.com</a>  <a href="mailto:privacy@lincotek.com">privacy@lincotek.com</a></p> <p>Business sector and activities:</p> <ul style="list-style-type: none"> <li>• Treatment and coating of metals. Provision of special services for the orthopaedic industry. (Medical)</li> </ul>
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	<p><b>COOKIE POLICY - MISSION</b></p> <p>We use cookies and similar solutions, hereinafter referred to as cookies only, to provide the users of our websites with a better browsing experience.</p> <p>Cookies are small text files that a website stores on the user's computer or mobile device when the user visits the site. Our Cookie Policy is intended to describe what types of cookies clearly and transparently are being used relating to the processing of personal data of the Users who visit our website and benefit from our services. Users can block the installation of profiling cookies not only by using the tool available and the related Consent Banner but also by changing your browser settings, as better explained in the following section "<a href="#">How to disable cookies</a>".</p> <p>Cookies help us:</p> <ul style="list-style-type: none"> <li>• make the web page work as it should;</li> <li>• increase the web site speed and security;</li> <li>• continuously improve our website;</li> <li>• give the opportunity to express interest and/or share a content;</li> <li>• offer promotional messages tailored to the user's personal preferences.</li> </ul>
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	<p><b>PRINCIPLES</b></p> <p>One of our main goals is to protect personal data.</p> <p>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><b>SOURCES OF PERSONAL DATA</b></p> <p><b>Personal data collected from the Data Subject:</b></p> <ul style="list-style-type: none"> <li>• Web pages and/or Social Media Profiles of the Data Controller.</li> </ul> <p><b>Personal data NOT collected from the Data Subject:</b></p> <ul style="list-style-type: none"> <li>• Public databases (International Public IP addresses etc.);</li> <li>• Internet / Search engines / Social Networks.</li> </ul>
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	<b>CATEGORIES OF DATA SUBJECTS</b>
	<ul style="list-style-type: none"> <li>• <b>Users:</b> 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.</li> </ul>

	<b>CATEGORIES AND PERSONAL DATA PROCESSED</b>
	<p><b>COMMON PERSONAL DATA:</b></p> <p><b>Browsing data and information about preferences and interests:</b></p> <ul style="list-style-type: none"> <li>• information entered or selected by the User to send the contact request/sales quote request through the dedicated website page (Personally identifiable information, contact details, given consent, IP address, date and time, etc.)</li> <li>• the company name (potential client or client), address and phone number after having finished browsing through a third-party cookie that collects and stores the User's IP address (we do not know this information);</li> <li>• type of navigation device, if mobile or fixed, to adjust how content on a page is displayed according to the dimensions of the device's screen (Responsive web design);</li> <li>• information about browsing preferences (in aggregated and unidentified form).</li> </ul>

 PURPOSE OF DATA PROCESSING	 DESCRIPTION OF PURPOSE AND LAWFULNESS OF PROCESSING	 DURATION OF THE PROCESSING AND DATA RETENTION PERIOD
1. Statistics	<p><b>Purposes of statistics and research, in aggregated and unidentified form, relating to the web navigation by the User, through Third-Party technical Cookies:</b></p> <ul style="list-style-type: none"> <li>• <b>“Google Analytics”:</b> to monitor how users interact and to store statistical information about users navigation, in aggregated and unidentified form: <a href="http://www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a>.</li> <li>• <b>“Google Tag Manager”:</b> to create or update tags, t.i. snippets of code on a website, in order to simplify the management of a marketing campaign and to store additional statistical information about the browsing process: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>.</li> </ul> <p><b>Lawfulness of processing:</b></p> <ul style="list-style-type: none"> <li>• Legitimate interest of the Data Controller;</li> <li>• Consent is not required.</li> </ul>	<ul style="list-style-type: none"> <li>• 12 months.</li> </ul>
2. Navigation monitoring	<p><b>Purpose related to the monitoring of navigation through third-party Cookies:</b></p> <ul style="list-style-type: none"> <li>• <b>“Lead Forensics”:</b> enables to uncover new leads, to monitor and reveal the identity and contact information of your unknown website visitors (company, address and phone number) as well as information about browsing (viewed web pages, time spent on a web page): <a href="https://www.leadforensics.com/privacy-and-cookies/">https://www.leadforensics.com/privacy-and-cookies/</a></li> </ul> <p><b>Lawfulness of processing:</b></p> <ul style="list-style-type: none"> <li>• Consent (optional and revocable at any time) through Consent Banners.</li> </ul>	<ul style="list-style-type: none"> <li>• 12 months.</li> </ul>
3. Expression of interest and sharing of one of our contents	<p><b>Purposes connected with expression of interest and/or sharing of one of our contents and/or viewing a video via Third-Party Social Cookies:</b></p> <ul style="list-style-type: none"> <li>• <b>“YouTube”:</b> allows you to view a video: <a href="http://www.google.com/intl/it_it/policies/technologies/cookies/">http://www.google.com/intl/it_it/policies/technologies/cookies/</a></li> </ul>	<ul style="list-style-type: none"> <li>• 12 months.</li> </ul>

	<ul style="list-style-type: none"> <li>• “<b>Facebook</b>”: allows you to share content on Facebook: <a href="https://www.facebook.com/plugins/like.php">https://www.facebook.com/plugins/like.php</a></li> <li>• “<b>Twitter</b>”: allows you to share content on Twitter: <a href="https://support.twitter.com/articles/20170514">https://support.twitter.com/articles/20170514</a></li> <li>• “<b>Linkedin</b>”: allows you to view content on LinkedIn: <a href="https://www.linkedin.com/legal/privacy-policy?trk=d_org_guest_company_overview_footer-privacy-policy">https://www.linkedin.com/legal/privacy-policy?trk=d_org_guest_company_overview_footer-privacy-policy</a></li> </ul> <p><b>Lawfulness of processing:</b></p> <ul style="list-style-type: none"> <li>• Consent (optional and revocable at any time) through Consent Banners.</li> </ul>	
4. Targeted advertising	<p><b>Online advertising, through Audience segmentation (for example age, geographical location, interests, etc.), through Third-Party Cookies, in aggregated and unidentified form:</b></p> <ul style="list-style-type: none"> <li>• “<b>GA Audiences</b>”: <a href="https://www.google.com/intl/it/policies/technologies/ads/">https://www.google.com/intl/it/policies/technologies/ads/</a></li> <li>• “<b>Double Click</b>”: <a href="https://www.google.it/intl/it/policies/privacy/">https://www.google.it/intl/it/policies/privacy/</a></li> </ul> <p><b>Lawfulness of processing:</b></p> <ul style="list-style-type: none"> <li>• Consent (optional and revocable at any time) through Consent Banners.</li> </ul>	<ul style="list-style-type: none"> <li>• 12 months.</li> </ul>

Some cookies remain active until the browser is closed or after logging out. Other cookies do not expire after closing browser and remain available for any subsequent visits by the same User. These cookies are known as persistent cookies and their lifespan is set by the server of the visited page when they are created. Sometimes they have an expiration date and sometimes their lifespan is unlimited.

For our part, we use persistent cookies, except for some information that we store for technical purposes only.


Please also note that, in line with the requirements of the Data Protection Supervisory Authority regarding the storage of personal data for profiling purposes, profiling cookies should be stored on the user's device for a period not exceeding 12 months.

In those cases in which we cannot set cookies expiry date as these settings are managed by Third Parties, we will request a new consent to the use of such cookies after 12 months.

In any case, the dedicated tool stores cookie consents for a period of 12 months. For this reason, on the expiry of that period the user will get the banner again through which the user shall give his/her consent to the use of cookies again.

If the user clears browsing history and related cookies, the banner for a new consent to the use of cookies will show again on first login.

But in any case, it is always possible to modify the already set choices at any time by following the instructions in the section “[Consent Statement](#)”.

	<p><b>CONTACT METHODS: COOKIES</b></p> <p>We use technical cookies for the correct functioning of the website and to retrieve information more easily, simplifying the connection and data transmission between users and web page, in particular:</p> <ul style="list-style-type: none"> <li>• <u>Session cookies</u>: allow users to be recognized within a website so any page changes or item or data selection you do is remembered from page to page, which brings faster navigation or to prevent the user from returning to the homepage when a request has already been sent or in private browsing mode.</li> <li>• <u>Functional cookies</u>: These cookies are used to store the preferences set by the user when browsing and to facilitate the use of certain services such as, for example, setting the language or viewing a video.</li> <li>• <u>Analytics cookies</u>: web services provided by a Third Party; these cookies are used to provide the user with a better browsing experience. Analytics cookies do not collect Personally Identifiable Information, as the collected data are in aggregated and unidentified form and the information provided refers to the total of the activities carried out. The collected data enable us to understand our website users' behaviour, the number of links on a website, the most visited web pages, the average visit duration, etc., thus resulting in a significant improvement in website content and layout.</li> </ul>
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We use the IP anonymisation feature for our website visitors' addresses so that these latter cannot be identified by Third Parties. This process of anonymising data takes place when data are transmitted to the systems of the Third Party, hence data collection and subsequent processing occurs without the full IP address being written down. In addition to that, we have added a new feature to block data sharing with Third Parties as well as with their partners. Therefore, considering that the processing of data both by us and by the Third Party is totally aggregated and anonymous, it is not necessary to request specific consent.

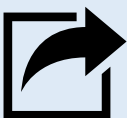
We also use **THIRD-PARTY COOKIES** set by a web page different from the one that is currently being visited, to provide the user with a better browsing experience and specifically:

- Social Cookies: to offer a more personalized browsing experience; they allow to interact with Social Networks and/or other platforms, share content or prove your interest using the Like button. The above buttons, boxes and news can be found on our website, but the content they contain comes directly from the related social networks and the publication of users' preferences or comments is subject to user profile access and subsequent authorization. Any interactions and information collected by us are subject to the privacy settings of the user profile for each social network.
- Browsing history monitoring cookies: to generate contacts of potential customers. They allow to identify the user (company, address and phone number) as well as information about browsing (viewed web pages, time spent on a web page).
- Advertising cookies: to promote our business through advertisements on Social Networks and other websites, as well as through product placement campaign on the most popular search engines. The target audience of these advertising campaigns is defined by means of certain parameters and based on interests expressed by the users while browsing Social Network, Search Engines and other web pages.

Learn more about online advertising on [www.youronlinechoices.com](http://www.youronlinechoices.com). You can opt out of almost all advertising cookies on [www.youronlinechoices.com/it/le-tue-scelte](http://www.youronlinechoices.com/it/le-tue-scelte).

Privacy implications vary from social network to social network and depend on the privacy settings you choose. The management of information collected by Third Parties is governed by the relevant Privacy Policies to which the user should refer. To ensure greater transparency, the Privacy Policies of the most common Social Networks, together with their web addresses and cookie management policy, are listed below:

- Facebook - privacy policy: <https://www.facebook.com/help/cookies/>
- Facebook (configuration): log in to your account. Privacy section
- Twitter - privacy policy: <https://support.twitter.com/articles/20170514>
- Twitter (configuration): <https://twitter.com/settings/security>
- Google+ - privacy policy: <http://www.google.it/intl/it/policies/technologies/cookies/>
- Google+ (configuration): <http://www.google.it/intl/it/policies/technologies/managing/>
- LinkedIn - privacy policy: <https://www.linkedin.com/legal/cookie-policy>
- LinkedIn (configuration): log in to your account. Privacy section & Settings
- YouTube - privacy policy: <http://www.google.com/intl/it/policies/technologies/cookies/>
- YouTube (configuration): log in to your account. Section Personal & Privacy Settings
- Pinterest - privacy policy: <https://about.pinterest.com/it/privacy-policy>
- Pinterest (configuration): log in to your account. Section Personal & Privacy Settings



#### DATA RECIPIENTS

Data may be processed by Third Parties that own the cookies used by us. Personally Identifiable Information together with expressions of interest and preferences are only available to Third Parties. Any profiling, conducted also by matching other information at their disposal and by adding other information, based on the analysis and processing of information relating to customs, habits, tastes, preferences, interests etc., also through automated processes, aimed at obtaining specific profiles, is carried out by Third Parties only. These are identifiable by means of the Cookies we use that are described in detail in the above section "[Purpose of Processing](#)".



#### **OBLIGATION TO PROVIDE PERSONAL DATA**

Provision of personal data through Third-Party Cookies is not mandatory but rather optional as it is not necessary for browsing the web with all its available operations.



#### **PARTIES AUTHORIZED TO PROCESS THE PERSONAL DATA**

Personal data may be processed by employees and collaborators in their functions, including the sales network and any other persons providing specific web services, that are responsible for the fulfilment of the above-mentioned purposes and 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**

We transfer no data directly abroad.

Personal data may be transferred to countries outside the EEA through Third-Party Cookies that we use. For more information please refer to the links made available by us in the above section "[Purposes of Processing](#)".

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](mailto:privacy@lincotek.com), the Data subjects have the right to obtain from the Data controller access to their personal data, blocking of data processing and subsequent data anonymization, rectification of inaccurate personal data, completion of incomplete personal data, restriction of their processing in the cases provided for in Art. 18 of GDPR, as well as objection to data processing in the event of legitimate interest of the Data Controller.

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").

Through the Consent Banner and by following the procedures set out below in the specific section "[Consent Statement](#)", Data subjects shall have the right to withdraw consent at any time for Marketing purposes and to object to the processing

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.



#### **CONSENT STATEMENT**

I declare that I have read and understood the above Cookie Policy, I am aware my consent is purely optional and may be revoked at any moment.

On first login a banner with the link to this Cookie Policy and the request for consent to use cookies will pop up.

For more information about the Banner: [www.cookiebot.com/it/features](http://www.cookiebot.com/it/features).

Consent can be given by clicking on the OK button on the banner, by scrolling the page and/or accessing the external area of the banner with a simple click and/or accessing other areas by clicking on the links under the banner.

If you want to give consent to some types of cookies only, simply click on the "Show Details" link. The banner expands and shows a detailed list of all cookies used, divided by categories according to the various purposes. To refuse consent to any of the cookie categories you must deselect the flag near the cookie name and confirm your choice.

We do not install any cookies without your prior consent.

##### Modification of Consent:

You can change the previously expressed consent through the banner by clicking on the "[Cookie settings](#)" link shown in the footer of each page. A detailed list of all cookies, divided by categories, is displayed. To

change your consent to one or more cookies you must deselect the flag near that cookie/those cookies and confirm your choice.

To disable cookies:

The technological solution in use allows you to refuse consent to the use of third-party cookies in whole or in part.

You can also block cookies directly via the settings on your browser; you will still be able to browse the web without any problem.

Below are the links explaining how to disable cookies for the most popular browsers (for other browsers that may be used, we suggest looking for this option in the help desk software).

- Internet Explorer: <http://windows.microsoft.com/it-IT/internet-explorer/delete-manage-cookies>
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=it>
- Mozilla Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
- Apple Safari: [https://support.apple.com/kb/PH19214?locale=it\\_IT](https://support.apple.com/kb/PH19214?locale=it_IT)



**ENJOY YOUR BROWSING EXPERIENCE!**

