DRG SYSTEMS Srl
Via G. Galilei, n. 26, Gariga di Podenzano (PC)
P.IVA e C.F. IT01334440334

Privacy & Cookie Policy

for use of the websites and newsletter

Policy in accordance with ARTICLE 13, ITALIAN LEGISLATIVE DECREE 30/06/2003 No.196, Personal Data Protection Code, and ARTICLE 13 GDPR 679/2016, European Regulation on the protection of personal data.

In this document, website management methods are described in relation to the processing of the personal data of users who consult it, as well as the practices for the processing of data transmitted by the data subject to the controller through this website.

Pursuant to and for the purposes of Article 13 of (EU) Regulation no. 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereinafter also

"Regulation" or "GDPR"), and repealing Directive 95/46/CE, our company DRG SYSTEMS srl - Via G. Galilei, n. 26, Gariga di Podenzano (PC) (hereinafter also, "the Company" or "DRG SYSTEMS srl") is constantly committed to processing your personal data, provided voluntarily by you to DRG SYSTEMS srl - Via G. Galilei, n. 26, Gariga di Podenzano (PC), so that it is always based on the principles of lawfulness, correctness, transparency, limitation of the purposes and storage, data minimisation, accuracy, integrity, and confidentiality.

1. Categories of processed data

While browsing the website, DRG SYSTEMS srl may obtain information on the visitor in the following ways:

a. **navigation data**: some personal data acquired by computer systems and software procedures, as part of their standard operation, for the functioning of this website. The transmission of such data is inherent in the use of internet communication protocols. This data category includes: IP addresses, the type of browser used, the operating system, the domain name and addresses of the websites from which access was made, information on the pages visited by users within the website, the access time, the amount of time spent on a single page, the analysis of the internal journey, and other parameters relating to the operating system and the user's IT environment;

b. **other categories of data**: all personal data provided by the visitor/data subject through the website, for example, by registering and/or accessing a reserved area and/or service; and/or by participating in one of the initiatives promoted, launched, organised and/or

advertised by DRG SYSTEMS srl, exclusively or in partnership with third parties; by writing to a DRG SYSTEMS srl e-mail address to request information or phoning one of our numbers; or by using other connection systems to contact customer services directly. These include: personal data (such as name and surname), company name, VAT number, address, house number, city, postcode, region, country, date of birth, e-mail address, landline and/or mobile number, an identification number, and online ID (hereinafter “personal data”).

2. Purpose of processing and legal basis

The processing of personal data provided by you to DRG SYSTEMS srl has the following purposes:

a. Sending information and commercial communications, also of a promotional nature, including the sending of our newsletter, advertising material and/or offers of goods and services, by any means, including, by way of example but not limited to, mail, the Internet, phone, e-mail, MMS and SMS on behalf of DRG SYSTEMS srl, as well as on behalf of physical or legal entities contractually linked to DRG SYSTEMS
s.r.l. that send communications in the name of and on behalf of DRG SYSTEMS srl, only with your specific consent;

b. Allowing and managing your subscription to/registration for offers, promotions, competitions, training courses and events;

c. Allowing you to use the products and/or services, as well as carrying out activities reserved for you as a result of your subscription to offers, promotions, competitions and events;

d. Administrative and accounting purposes, and compliance with the obligations provided for by current legislation.

The legal bases of the purposes described above are the fulfilment of a request made by yourself as data subject and the consent provided by yourself.

3. Obligation to notify

We would like to remind you that, with regard to the purposes highlighted in points b), c) and d) of section 2, the provision of your personal data is mandatory.

If you refuse and/or provide inaccurate and/or incomplete information, this will prevent:

- with regard to the purposes in point b): your subscription to/registration for offers, promotions, competitions, training courses and events;
- with regard to the purposes in point c): use of the products and/or services, as well as the performance of activities reserved for you as a result of your subscription to and registration for offers, promotions, competitions, training courses and events;

- with regard to the purposes in point d): for DRG SYSTEMS srl, the performance of activities of an administrative and accounting nature, and compliance with legal obligations.
- with reference to the other purposes highlighted in point a), the provision of your personal data and your consent to such processing for the above-mentioned purposes, is optional. However, if you refuse to provide your data and/or consent to processing relating to the above-mentioned purposes and/or provide inaccurate and/or incomplete information, you may prevent the Company from:
- with regard to the purposes in point a): sending promotional communications on behalf of DRG SYSTEMS srl

4. Data processing method

The processing of your personal data will be carried out using suitable paper-based, electronic (DB, CRM platforms, etc.) and/or telematic tools, for the amount of time strictly necessary, and using logic that is strictly related to the purposes mentioned above, and, in any case, in such a way as to guarantee the security and confidentiality of the data. Specific security measures are observed to prevent the loss, unlawful or improper use of data and unauthorised access.

5. Recipients or categories of recipients of personal data

The personal data collected may be shared, for the purposes set out in section 2 above, with the data protection officer (if appointed), the members of the board of directors or another administrative body,

and, in any case, the managers appointed by DRG SYSTEMS srl and those in charge of the processing of personal data appointed by the Company, in the performance of their duties.

Your data may be communicated to any qualified subjects that provide DRG SYSTEMS srl with services that are instrumental to the purposes set out in the earlier paragraph 2, such as, by way of example only, parent, subsidiary, investee and/or associate companies; suppliers, contractors, subcontractors, banking and/or insurance institutions; or other subjects and/or entities that supply the following services on behalf of DRG SYSTEMS srl:

- management of websites and electronic and/or telematic tools used by DRG SYSTEMS srl;
- assistance and consultancy activities in marketing and communications;
- management of subscription to/registration for offers, promotions, competitions, training courses and events, as per paragraph 2, point b);
- sending information and promotional communications, also of a commercial nature, advertising material, and/or offers of goods and services.

Your data will not be disclosed in any way.

Your personal data will be processed by the data controller and/or the joint controllers within the territory of the European Union.

Should it be necessary to use subjects located outside the European Union for matters of a technical and/or operational nature (including cloud services), we are informing you immediately that such subjects will be appointed data processors pursuant to and for the purposes of Article 28 of the Regulation. Transfer of your personal data to such subjects, limited to the performance of specific processing activities, will be regulated in accordance with the provisions of Chapter V of the Regulation.

Therefore, all necessary precautions will be taken in order to guarantee the utmost protection of your personal data, basing such transfer: (a) on adequacy decisions of third-country recipients expressed by the European Commission; (b) on adequate guarantees expressed by the third-party recipient pursuant to Article 46 of the Regulation; (c) on the adoption of binding corporate rules.

More information can be received on request from the data controller using the contact information provided.

6. Duration of processing and criteria used for data storage

Data are processed only for the amount of time necessary for the purposes mentioned above in compliance with the principles of minimisation and limitation of storage pursuant to Article 5.1. e) of the Regulation.

The data processed for purpose a) will be stored in compliance with the legally prescribed terms for the type of activity, or until the withdrawal of consent, or until the right to object is exercised, as provided for by Article 21 of EU Regulation 2016/679.

The data processed for purposes b), c) and d) will be kept for as long as you are subscribed to the same programmes and for a period of 10 years following the termination of the relationship, unless further storage is required to allow DRG SYSTEMS srl to defend its rights and/or comply with legal, administrative or fiscal obligations.

7. Rights of the data subject

We would like to inform you that, with regard to your data, you can exercise your rights subject to the limits and conditions set out in Articles 7 and 15-22 of the Regulation.

I. to obtain confirmation of the existence or otherwise of personal data relating to you, even if you are not yet registered, and the communication of such data in an intelligible form;

II. to obtain information regarding: a) the origin of personal data; b) the purposes and methods of data processing; c) the logic applied in the event of processing carried out with the aid of electronic tools; d) the identification details of the data controller, data processors and any

appointed representative pursuant to Article 3.1, GDPR; e) subjects or categories of subjects to whom personal data may be communicated or that may become aware of them as appointed representatives in the territory of the state or as supervisors or people in charge;

III. to obtain: a) updates, rectification or, where necessary, data integration; b) the erasure, transformation into anonymous form or blocking of data processed in breach of the law, including those where their storage is not necessary with regard to the purpose for which the data were collected and subsequently processed; c) a declaration that the parties to which data have been communicated and distributed have been made aware of the operations mentioned in points a) and b), also in terms of their content, except in the event where doing so is impossible or would require the use of means that is clearly disproportionate to the right being protected;

IV. to object, fully or partially: a) to the processing of personal data relating to you for legitimate reasons, even if they are relevant to the purpose for which they were collected; b) to the processing of personal data relating to you for the purpose of sending advertising or direct sales material, or for carrying out commercial communications or market research, using automated call systems without the intervention of an operator by e-mail.

You also have the rights set out in Articles 16-21 of the GDPR (right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object), as well as the right to lodge a complaint with Italy's antitrust authority for the protection of personal data should you feel that your rights have been violated.

The data subject has the right to revoke the consent they gave previously, without prejudice to the lawfulness of the processing based on the consent prior to revocation.

To exercise these rights, please contact the data controller through the Privacy Office at the e-mail address drgprivacy@drgsystems.it; this request will receive an appropriate response within the period of time envisaged by the GDPR.

8. Website navigation

Redirect towards external websites

This website may use so-called social media plug-ins, special tools that allow for social network features, such as the "like" Facebook feature, to be incorporated within it directly.

All the social media plug-ins present on this website are marked by the respective logo owned by the social network (e.g., Facebook, Google, Twitter, LinkedIn).

When you visit one of our website pages and interact with the plug-in (e.g., clicking on the "like" button), or if you decide to leave a comment, the corresponding information will be transferred from the browser directly to the social network platform and will be stored by it.

For information on the purposes, type and methods of collection, elaboration, use and storage of personal data on behalf of the social network platform, as well as on the methods you can use to exercise your rights, please refer to the privacy policy implemented by the individual social network.

Connection to/from third-party websites

From this website, you can connect to other DRG SYSTEMS srl or group company websites via the specific links. This means that you can also connect to our website from third-party websites.

The data controller does not accept responsibility for any requests for and/or provision of personal data to third- party websites, and with regard to the management of authentication credentials provided by third parties.

9. Cookies & Cookie Policy

What are cookies

Cookies are parcels of information, in the form of text files, that are sent by a web server, such as a website, to the user's internet browser. They are then stored in the computer, which memorises them automatically, and are automatically sent to our servers or the servers of third parties that we use every time you access the website. By default, almost all web browsers are automatically set up to accept cookies.

This website may use, also in combination with one another, the following types of cookies, which are classified according to the indications provided by Italy's data protection authority and the opinions issued in Europe by the working group pursuant to Article 29 of the GDPR:

a) **Session**: these are cookies that are not stored permanently on the user's computer and are cancelled when the browser is closed. They are strictly limited to the transmission of session identifiers that are necessary for the safe and efficient navigation of the website. They avoid having to resort to other computer techniques that are potentially detrimental to the confidentiality of the user's navigation;

b) **Persistent**: these are cookies that are stored on the computer's hard disk until they expire or are cancelled by users/visitors. Through persistent cookies, visitors that access the website (or any other users of the same computer) are automatically recognised on every visit. Visitors can set their computer browsers to accept/refuse all cookies or display a warning every time a cookie is proposed. That way, they can assess whether to accept it or otherwise. The user can, however, change the default configuration and disable cookies (i.e., block them permanently), by setting the highest level of protection;

c) **Technical cookies**: these cookies are used for authentication to benefit from multimedia content, such as Flash Player, or to permit the choice of language for browsing. In general, it is not, therefore, necessary to obtain the user's prior and informed consent. Cookies used to statistically

analyse accesses/visits to the website also come under this category, provided that they are exclusively used for statistical purposes and through the collection of information in an aggregate form;

d) **Non-technical**: these are all the cookies used for profiling and marketing purposes. If users have not been sufficiently informed beforehand and have not given valid consent in accordance with the opt-in method, the use of these cookies on their computer terminals is forbidden.

These types of cookies can, in turn and on the basis of the functions they perform, be grouped into:

a) **Analytics**: these are the cookies used to collect and analyse statistical information on the accesses/visits to the website. In some cases, when associated with other information, such as credentials inserted to access reserved areas (your e-mail address and password), they may be used to profile the user (personal habits, websites visited, content downloaded, types of interactions, etc.);

b) **Widgets**: all the graphic components of a program's user interface, whose purpose is to facilitate the user in their interaction with the program itself, come under this category. By way of example, Facebook, Google+ and Twitter cookies are widgets;

c) **Advertising**: cookies used to advertise within a website come under this category. Google and Tradedoubler are two companies that use them;

d) **Web beacons**: code snippets that allow a website to transfer or collect information by requesting a graphic image come under this category. Websites can use them for different purposes, such as the analysis of the use of websites, control activities, reporting on advertising, and the personalisation of advertising and content.

How cookies are used

The use of permanent technical cookies or session cookies is strictly limited to and necessary for the purposes of safe and efficient navigation of the website and its applications. The technical cookies used on this website avoid having to resort to other computer techniques that are potentially detrimental to the confidentiality of the user's navigation.

Except for cookies that are strictly necessary from a technical point of view or purely statistical with aggregated data, this website also uses some systems – cookies, beacons – with the user's prior consent, that analyse the user's navigation to create statistics on visits or improve the content offer and, potentially, position targeted advertising on web pages. The systems that are currently being used are:

a) **Google Analytics** (https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=it).

b) **Pixel di Facebook** (https://www.facebook.com/policies/cookies/).

c) **IntelligenceFocus**.

d) **WebTrekk** (https://www.webtrekk.com/en/index/opt-out-webtrekk/).

Cookies for which consent is required

In addition, should you give your consent through one of the simplified procedures described in this document and presented when you first access a DRG SYSTEMS srl website, or by following the instructions below, DRG SYSTEMS srl may install and/or allow third-party companies mentioned below to install, additional, so-called profiling, cookies. In relation to these, you may decide to change or revoke, fully or partially, the consent provided by using the links below:

Third-party cookies

For the processing of personal data that, with your consent, third-party companies known to DRG SYSTEMS
s.r.l. may carry out through cookies, click on the links below to provide your consent or otherwise, and follow the relevant instructions after having read the different privacy policies:

- **Facebook** Should you give your consent, through DRG SYSTEMS srl's websites, Facebook may process your personal data to provide you with an enhanced browsing experience thanks to social network features and services: https://www.facebook.com/policies/cookies/
- **Twitter** Should you give your consent, through DRG SYSTEMS srl's websites, Twitter may process your personal data to provide you with an enhanced browsing experience thanks to social network features and services: https://support.twitter.com/articles/20170519-uso-dei-cookie-e-di-altre-tecnologie-simili-da-parte-di-twitter
- **Google+** Should you give your consent, through DRG SYSTEMS srl's websites, Google+ may process your personal data to provide you with an enhanced browsing experience thanks to social network features and services: https://www.google.com/intl/it_ALL/policies/privacy/
- **Linkedin** Should you give your consent, through DRG SYSTEMS srl's websites, LinkedIn may process your personal data to provide you with an enhanced browsing experience thanks to social network features and services: http://it.linkedin.com/legal/cookie-policy
- **Pinterest** Should you give your consent, through DRG SYSTEMS srl's websites, Pinterest may process your personal data to provide you with an enhanced browsing experience thanks to social network features and services: https://help.pinterest.com/en/articles/personalization-and-data-other-websites
- **Google Analytics** DRG SYSTEMS srl's websites have enabled Google Analytics advertising features. The advertising functions implemented are: Google Analytics reports on demographic data and interests.

The activation of these advertising features allows Google Analytics to collect data on traffic through cookies for Google advertising and anonymous identifiers, as well as data collected through the standard implementation of Google Analytics. The DRG SYSTEMS srl websites collect and use data from advertising based on Google interests or Google Analytics third-party audience data (e.g., age, sex and interests). They also use Google Analytics features implemented on the basis of display advertising (e.g., remarketing, Google Analytics reports on demographic data and interests). The above-mentioned data are used exclusively for statistical purposes and those of audience analysis. The data are collected and aggregated anonymously using owned or third-party software (e.g., Google Analytics). DRG SYSTEMS srl's websites and third-party suppliers, including Google, use both proprietary cookies (such as Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) to inform, optimise and publish ads on the basis of previous visits by the user to DRG SYSTEMS srl's websites. Google Analytics can be disabled for display advertising, and Google Display Network ads can be personalised in the following ways:

-By using the ads settings: https://www.google.it/settings/ads

-Through the components that are currently available for the deactivation of Google Analytics for the Web: https://tools.google.com/dlpage/gaoptout/

- **Google Maps** Should you give your consent, through DRG SYSTEMS srl's websites, Google Maps may process your personal data to provide you with advertising that is also based on your interests: https://policies.google.com/technologies/cookies?hl=it
- **AppNexus** Should you give your consent, through DRG SYSTEMS srl's websites, AppNexus may process your personal data to provide you with advertising that is also based on your interests: https://www.appnexus.com/en/company/platform-privacy-policy
- **Turbo** Should you give your consent, through DRG SYSTEM S srl's websites, Turbo may

process your personal data to provide you with advertising that is also based on your interests: http://www.turboadv.com/privacy/

- **77 Agency** Should you give your consent, through DRG SYSTEMS srl's websites, 77 Agency may process your personal data to provide you with advertising that is also based on your interests: http://www.77tracking.com/77AgencyCookiePolicyIT.pdf
- **Admobsphere** Should you give your consent, through DRG SYSTEMS srl's websites, Admobsphere may process your personal data to provide you with advertising that is also based on your interests: http://www.iubenda.com/privacy-policy/563692

First-party cookies

- **Salesforce DMP** Should you give your consent, through DRG SYSTEMS srl's websites, Salesforce DMP may process your personal data to provide you, or enable you to be provided with, content and advertising that are also based on your interests: https://www.salesforce.com/products/marketing-cloud/sfmc/salesforce-dmp-privacy/?mc=DMP

For the processing of personal data that, with your consent, third-party companies known to DRG SYSTEMS s.r.l. may carry out through cookies, go to this link. By using the relevant service, you will be able to personalise your choices: http://www.youronlinechoices.com/it/le-tue-scelte or http://www.aboutads.info/choices.

The main remarketing tools that we may use are:

a) **Google Adwords**: For further information on Google Remarketing, you can visit the web page: https://support.google.com/adwords/answer/2454000?hl=it&ref_topic=2677326.

   For further information on Google's privacy policy and principles, you can visit the web page: http://www.google.it/policies/technologies/ads/

b) **Facebook Ads**: For further information on Facebook Remarketing, you can visit the web page: https://www.facebook.com/help/1505060059715840

We would like to remind you that you can set your internet software browser (e.g., Firefox, Internet Explorer, Safari, Chrome) to not accept cookies, even technical ones, by activating so-called "anonymous browsing". In that case, no data will be processed by these systems.

How to disable cookies by configuring the browser

If you wish, you can also directly manage cookies through your browser settings. However, deleting cookies may remove the preferences you have set for DRG SYSTEMS srl's websites (for this reason, it would be advisable to visit this page periodically to check your preferences).

For further information and support, you can also visit the specific help page of the web browser you are using

- Google Chrome (https://support.google.com/chrome/answer/95647?co=GENIE.Platfor%3DDesktop&hl=it);
- Microsoft Edge (https://privacy.microsoft.com/it-it/windows-10-microsoft-edge-and-privacy);
- Internet Explorer (https://support.microsoft.com/it-it/help/260971/description-of-cookies);Mozilla Firefox (https://support.mozilla.org/it/kb/Eliminare%20i%20cookie);

- Safari Desktop(https://support.apple.com/kb/PH21411?locale=it_IT&viewlocale=it_IT);
- Safari Mobile (https://support.apple.com/it-it/HT201265)
- Opera (http://help.opera.com/Windows/10.00/it/cookies.html).

Social media plug-ins

The “social media buttons” are visible on the website to allow the user to use their registration information for social networks, including:

- Facebook;
- Twitter;
- LinkedIn;
- Google+;
- Pinterest;
- Whatsapp.

to request registration/signing up for the services offered by DRG SYSTEMS srl

These platforms may leave cookies on the user’s device through the website (third-party cookies), in order to collect information on user navigation.

For further information on the management of cookies and the privacy policy belonging to:

- Facebook (https://www.facebook.com/policies/cookies/);
- Twitter (https://help.twitter.com/it/rules-and-policies/twitter-cookies);
- LinkedIn (https://www.linkedin.com/legal/cookie-policy);
- Google+ (https://policies.google.com/technologies/cookies?hl=it);
- Pinterest (https://policy.pinterest.com/it/cookies);
- Whatsapp (https://www.whatsapp.com/legal/?lang=it#cookies).

10. Cookies - Acceptance or refusal of cookies

By continuing to browse this website, closing the information banner, clicking on any part of the page or scrolling down to see more content, the data subject is clearly and explicitly accepting DRG SYSTEMS srl’s Cookie Policy, and the cookies that you have not refused will be set and collected. If you do not accept the cookies and leave the navigation page, any cookies that have already been registered locally in your browser will remain there but will no longer be read or used by DRG SYSTEMS srl, until the subsequent and potential acceptance of the policy.

You will always be able to remove these cookies at any time by using the methods mentioned above or via the websites http://www.youronlinechoices.eu/it/, http://www.aboutads.info/choices or

http://www.allaboutcookies.org/manage-cookies/index.html for those that are not controlled by DRG SYSTEMS srl

11. Cookies - Length of data processing

The cookies managed by DRG SYSTEMS srl remain for a maximum of 730 days, unless they are renewed voluntarily by the user/data subject, reiterating their consent.

The cookies managed by third parties remain for as long as is indicated in the respective cookie policies.

12. Cookies - Rights of the data subject

The user can exercise their right to object to the full use of cookies by leaving this website and refusing, in this way, the use of technical cookies that are fundamental for its functioning.

Instead, you may refuse third-party cookies that are not managed by DRG SYSTEMS srl by following the instructions available on the websites http://www.youronlinechoices.eu/it/, http://www.aboutads.info/choices or http://www.allaboutcookies.org/manage-cookies/index.html.

Any request for information or clarification, or to exercise your rights, may be sent to the data processor using the following contact details:

- Ufficio Privacy c/o DRG SYSTEMS srl - Via G. Galilei, n. 26, Gariga di Podenzano (PC)
- or by sending an e-mail to the address: drgprivacy@drgsystems.it

Furthermore, you retain the right to make a complaint to the Italian antitrust authority for the protection of personal data, which can be contacted at the e-mail address garante@gpdp.it or via the website http://www.gpdp.it.

13. Data Controller and Personal Data Processor

The controller for the processing of your data is DRG SYSTEMS srl with registered office at Via G. Galilei, n. 26, Gariga di Podenzano (PC) in the person of its legal representative. Any request relating to the personal data processed by DRG SYSTEMS srl may be sent to the Company's registered office or communicated in writing to the e-mail address drgprivacy@drgsystems.it.

The updated list of data processors is available from the Company and can be viewed on request in the above-mentioned ways.

This document may be subject to updates and alterations, so the user is invited to visit this page/section periodically in order to be aware of the processing methods for the personal data collected by DRG SYSTEMS srl

Gariga di Podenzano, 16 Luglio 2018

The Data Controller
DRG SYSTEMS Srl