

Document title: Privacy Notice pursuant to Article 13 of the European Regulation 679/2016– Web Forms

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This Privacy Notice sets out the basis on which Eurofins' website users and/or Participants in webinars and training courses and/or Potential Customers ("**You**") personal data provided through Eurofins' (defined below under "*controller information*") web forms will be processed by Eurofins.

We inform you that, pursuant to the European Regulation 2016/679 (hereinafter referred to as "**GDPR**" or "**Regulation**"), the Personal Data provided will be processed, including by means of computer and electronic tools, by Eurofins, which, as "**Data Controller**", provides you with the following information under Article 13 of the GDPR.

Please read the following carefully to understand Eurofins practices regarding your personal data and how Eurofins will treat it. If you have any questions regarding this Privacy Notice or if you want to lodge a request in relation to your personal information, please contact us via our contact point: privacyfoodassurance@cpt.eurofinseu.com

Controller information

The person in charge of the control of any information obtained through this web form (referred hereinafter as the "**Controller**" or "**Eurofins**" or "**we**") is:

Eurofins Food Assurance Italia srl
Via B. Buoizzi 2
20055 Vimodrone
P.IVA/C.F. 11400450018

What personal information do we collect and how?

We collect the personal information which are requested in our web forms and that you agreed to give us. Such personal information usually consists of common personal data, such as:

- data about your identity and fiscal information such as your form of greeting, your last name, your first name;
- data about your occupation such as the name of your company and the title of your position;
- information on how to contact you such as your e-mail address, your professional direct phone, your professional mobile phone and your postal address;
- data about your communication preferences such as the language and channel to be used;
- data about your business interests;
- data about events you want to participate to (webinars, exhibitions, trainings, etc.);
- data about your participation in the events (webinars, exhibitions, trainings, etc.) or purchase of our other services and products;

You should only give us the personal information requested in the web forms and if you do not agree to provide us with this information, you must not fill in the web forms. However, if you want us to respond and execute your request or if you want to enter into a business relationship with us, you should provide us with the information necessary to enter into the relevant contracts and perform the relevant services.

We also use the user-behaviour tracker tool available on our CRM software enabling us to know for example if you opened a newsletter or clicked on a link in order to optimise the content of our newsletters and their usability.

Why do we use personal information about you?

We may use the information we collect through the web forms for the following purposes:

- contact you in the ways indicated;
- provide, administer and communicate with you about products, services, events, surveys and promotions by Eurofins or our affiliates (marketing activities also through the sending of promotional and advertising material in relation to products and/or services offered by the Controller);
- soft spam activities through the sending of promotional and advertising material relating to products and/or services similar to those covered by the existing contractual relationship
- give you the possibility to attend seminars and trainings;
- conclude and execute the contract with you related to your use of our services or products;
- activities related to the management of business relationships such as, by way of example, compilation of master data and database entry, ordinary bookkeeping, invoicing;
- fulfilment of legal obligations of administrative, accounting and tax nature;
- process, evaluate and respond to your requests and enquiries (including quote requests, documentation requests, free tests requests) and complaints related to our services and products;
- evaluate your interest in employment (including current or future job positions) and contact you regarding possible employment;
- establish pre-contractual negotiations and/or a contractual relationship with you;
- ensure customers satisfaction through sending customers surveys;
- maintain our software (including but not limited to bug fixes);
- gathering statistics on your responsiveness towards our emails;
- be able to make your rights described below exercisable and exercising and/or defending a right of the Controller in the competent venues.

We also may use personal information for additional purposes. We will identify these additional purposes at the time of collection if any.

There are no automated decision-making processes.

Which processing ground(s) do we rely upon for processing your personal information?

In order to process your personal data, depending on the situation, we rely on:

- our legitimate interests (not for sensitive data), being
 - reply to your orders, inquiries, complaints;
 - recruiting of candidates to fill in any of our present or future job vacancies within one of the companies of the Eurofins Group;
 - prevention of fraud;
 - direct marketing (soft spam);
 - the necessity for the establishment, exercise or defense of legal claims;
 - transfer of information within the group for administrative purposes;
 - maintenance (including but not limited to bug fixes) of our database;
 - ensure quality and upgrade our services, products or systems;
 - ensure security and business continuity of our enterprise, systems, products or services.
- legal obligations (regarding sensitive data, only legal obligations in the field of employment and social security law);
- contract performance, including the continuous improvement of the services provided under such contracts;
- ensure performance of a contract entered into with your employer and/or You or pre-contractual measures taken at your request;
- your consent (as, for example, in marketing activities).

If you give us your consent to process your personal information for a specific purpose, can you withdraw it afterwards?

Yes, you can withdraw your consent in full or in parts at any time by changing your preferences through a link provided in all emails footer or by contacting our contact point indicated above.

Who your personal information will be transferred to?

Your personal data might be transferred to any Eurofins affiliates (which can be found at <https://www.eurofins.com/>), in addition, the Personal Data, conferred for the above-mentioned purposes, may be accessed by certain employees and/or collaborators of the Data Controller, specially authorized and trained. We do not sell or otherwise disclose personal information about you to third parties except as described below:

- companies and/or subjects that provide, in favor of the Data Controller, administrative, accounting, fiscal, IT and management services and/or services, also for credit recovery purposes;
- companies and employees of the Eurofins Group as part of intercompany relations and/or administrative, accounting, tax, IT or health and safety at work services and/or services pursuant to Legislative Decree no. 81 of 2008;

- public bodies and entities in order to fulfill legal obligations to which the Data Controller is subject (e.g. of a fiscal nature);
- banks and credit institutions in relation to which the communication of Personal Data is necessary for the fulfillment of contractual obligations undertaken (management of collections and payments);
- consultants, accountants or lawyers who provide services functional to the purposes indicated above;
- to companies, organizations or individuals outside of Eurofins if we have a good reason to believe that access, use, preservation or disclosure of the information is reasonably necessary to:
 - execute and enforce contractual terms;
 - meet any applicable law, regulation, legal process or enforceable governmental request;
 - detect, prevent, or otherwise address fraud, security or technical issues;
 - protect against harm to the rights, property or safety of Eurofins, our users or the public as required or permitted by law;
- to regulatory or law enforcement agencies if we believe in good faith that we are required by law to disclose it in connection with the detection of crime, the collection of taxes or duties, in order to comply with any applicable law or order of a court of competent jurisdiction, or in connection with legal proceedings;
- to third parties as part of a merger, acquisition or bankruptcy, in the event we sell or transfer all or a portion of our business or assets (including through bankruptcy).

Will your personal information be transferred outside the country of your residence?

As part of the contractual relationship between the Data Controller and Eurofins Group companies, Personal Data may be transferred outside the EU territory. The Processing of such Personal Data is bound to the purposes for which it was collected and takes place in strict compliance with the standards of confidentiality and security set forth in applicable data protection laws.

Whenever Personal Data is subject to international transfer outside the territory of the EU, the Data Controller will take all appropriate and necessary contractual measures to ensure an adequate level of protection of Personal Data in accordance with the provisions set out within this Privacy Policy, including, among others, the standard contractual clauses approved by the European Commission.

Which rights do you have over your personal information?

The Data Controller informs you that, pursuant to Articles 15 et seq. GDPR, you have the right to:

- ask the Data Controller for confirmation of the processing or non-processing of your Personal Data;
- obtain access to, request rectification or updating of your Personal Data, object to, revoke consent (where it constitutes the legal basis of the Processing, and without prejudice to the lawfulness of the Processing based on the consent given prior to revocation), request data portability, request deletion or restriction of Processing, exercise the right to complain to the supervisory authority (Data Protection Authority - www.garanteprivacy.it).

You may address your requests to the Data Controller, whose contact details can be found in this Privacy Notice.

You also have the right:

- not to be subjected to a decision based solely on Automated Processing, including profiling, that produces legal effects concerning you or that significantly affects you in a similar way;
- to lodge a complaint with the Office of the Garante Privacy (by e-mail, at the address: garante@gpdp.it, or by mail, to the Garante per la Protezione dei Dati Personali, located in Rome (Italy), Piazza Venezia 11 Scala B, ZIP code 00187, ex art 77 Regulation;
- to take appropriate legal action ex art.79 Regulation.

How long will we keep your data for?

Personal Data will be retained for the period of time strictly necessary to achieve the purposes for which it was collected, determined on the basis of a criterion marked by compliance with the terms of the law and the principles of minimization of Processing and rational management of archives.

Specific Personal Data may be retained even after the termination of the contract, for as long as necessary to fulfil contractual, legal and specified purposes.

More specifically, Personal Data collected will be retained according to these principles:

- a. throughout the duration of the contract and for 10 years from the termination of the contract itself, a term corresponding to the ordinary statute of limitations;
- b. in the case of judicial litigation, for the entire duration until the exhaustion of the time limit for appeal actions and for 10 years from the termination of the last stage of proceedings, a term corresponding to the ordinary statute of limitations.

After the forementioned retention periods have expired, the Personal Data will be destroyed, deleted or anonymized, consistent with the technical procedures for deletion.

In addition:

- Data collected for marketing purposes will be kept until your consent is revoked, it being understood that, every 24 months, a CRM cleaning activity will be carried out in relation to inactive contacts;
- Data collected for soft spam activities will be retained for 5 years after the termination of the contractual