

## **Privacy policy SidP website – EU 2016/679**

Categories of data subjects: Website users and users of the members-only area

Update of the privacy policy: 30/08/2018

The present document contains the information requested pursuant to art. 13 of Regulation EU 2016/679 (hereafter “GDPR”) on the protection of natural persons with regards to the processing of personal data, without prejudice to the necessary changes and fulfilment of obligations for the transposition of EU norms in national legislation, and the European or national legislative initiatives and/or measures taken by the data protection authority subsequent to the publication of the present privacy policy. In keeping with the GDPR and in compliance with the principle of transparency, we have updated our privacy policy, which we invite you to read below:

### **1 Introduction**

The Italian Society of Periodontology and Implantology (SidP) undertakes to guarantee the protection of your personal data. Through the present information policy, we would like to give you a clear and transparent picture of which data we collect and process with regards to the users of our website and users of the members-only area.

In the following paragraphs we shall detail how we use your personal data, for what purposes, and for how long, while specifying how we guarantee your rights and compliance with personal data protection laws.

### **2 Identity and contact information of the data controller**

SidP Italian Society of Periodontology and Implantology, with legal headquarters in Florence, Via del Gelsomino, 20, Tel. 055 5530142 e-mail: [privacy@sidp.it](mailto:privacy@sidp.it), represented by its Legal Representative/Acting Chairperson, is the data controller of your personal data.

### **3 Identity and contact information of the data supervisor**

Concerning the processing of the personal data stored in the institutional website, the data controller has designated an external data supervisor: MJ Eventi di Manuela Bertelli e C. sas – Via Scialoia, 46 – 50136 Florence. The data centre hosting the institutional website is located in the European Union

#### **4 Designation of a data protection officer (DPO)**

The data controller of SIdP Italian Society of Periodontology and Implantology, in compliance with the principle of accountability introduced by the GDPR and as part of the creation of a management model for data protection has carried out an analysis of the personal data processed by the organization.

This analysis shows that, due to the characteristics of the organization, the nature of the personal data processed, and the categories of data subject, that none of the conditions listed under art. 37, par. 1 of the GDPR apply.

We also declare that the organization does not process data in a manner that requires the regular, systematic, and large-scale monitoring of data subjects, and does not process special categories of personal data on a large scale, or data concerning criminal convictions and offences.

For these reasons, the data controller for SIdP Italian Society of Periodontology and Implantology did not deem it necessary to designate a data protection officer (DPO).

#### **5 Purposes and legal basis of data protection**

If you are an SIdP member registered in the members-only area, your data will be processed for the following purposes:

- a) Administrative management, accounting, and customer care related to our services, thus for purposes strictly related and instrumental to the fulfilment of the necessary organizational activities, customer relations management (administrative and accounting activities, assistance for members, management of claims, debt collection), and the delivery of requested services.
- b) To comply with legal obligations and requests from the data protection authority, and to comply with legislation on the prevention of fraud, money laundering, and the funding of terrorism, where applicable – D.Lgs. 231/2007.
- c) For the purposes of CME (Continuing medical education) accreditation for the professional development of its members.

- d) Fulfilling obligations related to the organization of events, conferences, and meetings promoted by SidP – Italian Society of Periodontology and Implantology.
- e) For institutional communication and promotion activities on the part of SidP – Italian Society of Periodontology and Implantology.
- f) For communicating your data to third parties for institutional activities.
- g) For the dissemination of personal data such as the publication of members' directories on the institutional website.

The provision of your data for the purposes listed under letters a) and b) is mandatory as it is necessary for the carrying out and/or fulfilment of organizational and/or legal obligation, and failure to provide said data implies the impossibility of fulfilling these obligations, while the data processing purposes listed under letters c), d), c), f), and g) require your explicit consent. Should we already have acquired your explicit and specific consent, the same can be withdrawn at any time by writing to the email address [privacy@sidp.it](mailto:privacy@sidp.it).

There are no automated decision-making processes, including profiling.

## **6 Data processing modalities**

The processing of your data shall abide by the principles of lawfulness, fairness, and transparency, and may take place through automated modalities to store said data, manage it, and transmit it in an accurate manner, and shall take place through technical and organizational measures that can guarantee their security and protection from unauthorized or unlawful processing, loss, destruction, or accidental damage. The personal data acquired shall be used by the designated data supervisors and by authorized and adequately trained physical persons.

## **7 Personal data and cookies**

The internet browsing activity of users of the institutional websites who are not registered in the reserved area is collected using so-called cookies, small text files that the websites visited by the users send to their computers, where they are stored and then re-transmitted to the same websites on the next visit.

Generally speaking, we use the technical cookies needed to ensure the best possible functionality of our website for its users. Should you prefer to disable/refuse the use of such cookies, you may at any time modify the settings of your web browser.

The website also hosts third-party cookies for statistical purposes, collected anonymously: Google Analytics. To disable third-party cookies click [here](#). For more information on our cookie policy, consult the full policy [here](#).

## **8 Redirect to external websites**

The website uses so-called social plug-ins, special tools that make it possible to incorporate social network functionalities into a website (e.g. the “like” button on Facebook).

All of the social plug-ins hosted by the website are identified by the proprietary logo of the social network in question, in this specific case the Facebook logo. Whenever a user interacts with the social plug-in, the information related to the data subject is transmitted directly to the social network, which processes his or her data as an autonomous data processor; therefore, in order to obtain more details on processing modalities and purposes, the rights that can be exercised, and the storing of personal data, please consult the social network’s privacy policy.

## **9 Recipients of personal data**

We transmit your data only to the subjects that assist us in carrying out the necessary activities for the achievement of the goals indicated and described under point 5 above, including among others:

- third-party companies that provide services related to verification of compliance with legal obligations (e.g. anti-money laundering);
- third-party companies that provide logistical services;
- companies that carry out on our behalf activities related to the technical coordination, assistance, and maintenance of information systems;
- more generally, third-party companies providing assistance on matters related to insurance.

We may explicitly designate the above-mentioned subjects as data processors, the list of which can be requested from the data controller at the email address

[privacy@sidp.it](mailto:privacy@sidp.it).

We may also transmit your data to subjects to whom transmission is due in order to comply with legal obligations, and to the credit institutions with which we work for organizational purposes. These subjects carry out data processing as autonomous data controllers.

## **10 Transfer to third countries**

We do not normally transfer your data outside the EU.

If that should not be the case, we shall ensure that the recipient, operating as data processor, complies with the dispositions set out in the GDPR, including the norms dealing specifically with the transfer of personal data to third countries. In particular, we guarantee that these transfers take place on the basis of an adequacy decision or of the undersigning of data protection clauses adopted by the European Commission.

In order to know whether your personal data has been transmitted to third countries, along with the related additional information, you may send a request to the data controller at the following email address: [privacy@sidp.it](mailto:privacy@sidp.it).

Your data shall not be sent to third-party company located outside the European Economic Area. Should this be necessary, we undertake to ensure that the recipients of your data have adopted suitable security measures to guarantee the protection of said data.

## **11 Period for which the personal data are stored**

Your personal data shall be stored for the strict minimum necessary for the fulfilment of the specific purposes of data processing for which you have given your consent, and more specifically:

- For the purposes indicated under letters a) and b) of point 5 for the period necessary for the fulfilment of contractual obligations, and in any event for no longer than 10 years from the collection of your data for the fulfilment of legal obligations, for a period no longer than that required by the law.
- For the purposes indicated under letters c) d) and f) e g) of point 5 for 24 (twenty-four) months from when consent for processing was given, each user can opt out of consent by clicking on the specific link at the bottom of the notice sent electronically, or by sending an email to [privacy@sidp.it](mailto:privacy@sidp.it).
- Finally, we reserve the right to store log data for the institutional website server for a period of 12 (twelve) months in order to be able to deal with any felonies committed against the website and to comply with requests from legal authorities.

## **12 Rights of the data subject (art. 13 GDPR)**

- **Right of access (art.15 GDPR):** The data subject shall have the right to obtain from the controller confirmation of whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data.
- **Right to rectification and erasure (articles 16-17 GDPR):** The data subject shall have the right to request the rectification and erasure of personal data that are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- **Right to restriction of processing (art.18 GDPR):** The data subject has the right to request restriction of processing of personal data when one of the conditions listed under art.18 GDPR apply.
- **Right to data portability (art.20 GDPR):** The data subject shall have the right to receive, in a structured, commonly used, and machine readable format the personal data he or she has provided to a controller, and

to transmit those data to another controller without hindrance from the controller to whom the personal data have been provided.

- **Right to object to processing (art.21 GDPR):** The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her based on the condition of lawfulness of legitimate public interest and the exercise of official authority, including profiling.
- **The right to withdraw consent:** The data subject shall have the right to withdraw his or her consent at any time, without prejudice to the lawfulness of processing based on consent given prior to withdrawal.
- **The right to lodge a complaint with the supervisory authority (Italian Data Protection Authority).**

The rights above can be exercised by writing to the following email address: [privacy@sidp.it](mailto:privacy@sidp.it). The exercise of your rights as a data subject is free of charge pursuant to article 12, GDPR