

PRIVACY POLICY FOR PROCESSING CUSTOMER/SUPPLIER PERSONAL DATA

In accordance with Articles 13 and 14 of EU regulation 2016/679 on “*Protection of natural persons with regard to the processing of personal data and on the free movement of such data*” (hereafter referred to as “Regulation”), Copan Italia S.p.A., based in via F. Perotti 10, 25125 Brescia, Italia ID VAT No. 01740560170 parent company of the following:

- **Copan Wasp S.r.l.**, via A. Grandi 32, 25125 Brescia, Italia, P.IVA 03521190987
- **Copan NewLab S.r.l.**, via A. Grandi 32, 25125 Brescia, Italia, P.IVA 03228560987
- **Copan Industries Inc** San Antonio Industrial Park – Aguadilla Porto Rico 00690 - USA
- **Copan Diagnostic Inc** 26055 Jefferson Avenue Murrieta, CA 92562
- **Copan Medical Shanghai Ltd**, 1st floor, plant 6-A, No. 258, Zhijiang Road, Fengxian district, Shanghai, China, Account number: 448172050463
- **Copan Innovation Shanghai Ltd**, Unit D&E, 1st floor, block A, No.1123 Hongmei road, Minhang district, Shanghai, zip 201102, China
- **Copan Japan CO** 5-5-2, Minatojima Minamimachi, Chou-Ku, Kobe City, 650-0047, Japan
- **Copan Australia Pyl Limited**, 11 Lincoln Plc Castle Hill NSW 2154

(Hereinafter collectively referred to as “Copan”), as data controller, manages a series of personal data relative to your company. In order to ensure the protection and exercise of the rights provided by Regulation regarding the protection of personal data, the data subject is informed of the following:

1. Contact details of Data Protection Officer

Copan has not deemed it necessary to designate a Data Protection Officer (DPO) since the data processing carried out does not fall within the requirements for designation of the DPO specified under Art. 37 of the Regulation.

2. Purposes of processing

The processing of your personal data by Copan will be carried out for managing commercial and contractual relationship.

In particular the processing of your personal data will be carried out for:

- a) Fulfilment of contractual obligation toward the data subject;
- b) Fulfilment of tax, accounting and laws obligation;
- c) Sending promotional and/or update material by email;

3. Legal basis of processing

The legal basis of the processing is specified in Article 6, points b) and c) of the Regulation.

(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes; b) the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; c) processing is necessary for compliance with a legal obligation to which the controller is subject.

4. Method of processing

Your personal data will be processed by digital and hard copy means, in accordance with the personal data protection regulations, including those relative to data security.

5. Categories of recipients of personal data

The data provided by you will be communicated to public and private parties with regard to the above-mentioned purposes.

The personal data is communicated on the basis of the legal obligations. Your personal data may be communicated to parties appointed by Copan as External Processing Officers for purposes strictly linked to accounting and administrative management.

Copan is also obliged to communicate the data to the Judicial Authorities every time a specific request is made.

6. Data storage

Your personal data will be stored in accordance with the security measures adopted by Copan regarding data protection, and access to the personal data will only be granted to personnel involved and duly authorised for processing the personal data.

Your personal data will be stored until the completion of the rights resulting from the contractual, accounting and laws relationship.

7. Rights of the data subject

You can exercise your rights at any time in accordance with Article 13, point b) and Articles 15, 16, 17, 18 and 20 of the Regulations by sending a registered letter to Copan Italia S.p.A. – Legal Department– via F. Perotti 10, 25125 Brescia, Italy or an e-mail to privacy@copangroup.com.

In particular, in the capacity of data subject, you may request:

- a) access to your personal data, in accordance with the provisions of Article 15 of the Regulation;
- b) rectification of your personal data, in accordance with the provisions of Article 16 of the Regulation;
- c) erasure of your personal data ("*right to be forgotten*"), in accordance with the provisions of Article 17 of the Regulation;
- d) restriction of processing of your personal data, in accordance with the provisions of Article 18 of the Regulation;

Lastly, you may also object to the processing of your personal data at any time, in accordance with Article 21 of the Regulation, in the event of any situations specified under Article 6, paragraph 1, points e) and f) of the Regulation.

8. Consent and revocation

You can revoke your consent at any time by sending a registered letter to Copan Italia S.p.A. – Legal Department– via F. Perotti 10, 25125 Brescia, Italy or an e-mail to privacy@copangroup.com.

9. Complaint to a Supervisory Authority

In accordance with Article 77 of the Regulation, it should be noted that you have the right to lodge a complaint with the Supervisory Authority (Personal Data Protection Commission) if you consider that the processing of your personal data infringes the Regulation.

10. Nature of processing and mandatory requirement to provide personal data

Much of the data requested is necessary (also in the execution of obligations deriving from legal regulations) for the activities aimed at the establishment of a contractual relationship. In some cases, failure to provide the data may result in failure to carry out these activities.



11. Existence of automated decision-making processes for data processing

It should be noted that there is no type of automated decision-making process for the personal data processing, in accordance with Article 22 of the Regulation.