

INFORMATION EX ART. 13 AND 14 REG.679 / 2016

At Key-Stone Srl - registered office in via Severino Doppi 20 b, 10095, Grugliasco (To); Data Controller in the person of the legal representative pro-tempore; VAT number 07161770016; phone number +39 011/3119430; e-mail address [dpo@key-stone.it](mailto:dpo@key-stone.it) - personal data concerning persons are processed for the purposes indicated below:

1) Provision of marketing services and market research - training / educational, informational, editorial activities (also via e-mail). Key-Stone mainly carries out dental market research activities. This activity can be a) descriptive or qualitative, if it is developed through surveys and interviews with a sample of respondents belonging to a given universe of reference; or b) "focus group" type if it is developed through the analysis of the behavior of a small group of participants, in relation to a specific qualitative topic (product test, creative analysis of images, advertising campaigns, etc.). Among the activities envisaged by the corporate purpose and for which this information is regulated, it is indicated that Key-Stone carries out these activities on own account and on third parties account. For all these activities the data of the interested parties can be acquired by:

a) Public sources, i.e. public registers, lists or documents that can be accessed by anyone based on the current reference legislation, within the limits and with the methods that are established for the knowability, usability and publicity of data contained therein, including, by way of example and not exhaustively:

a.1) Italian Business Register;

a.2) "Telemaco Infocamere" organization.

b) All sources publicly and generally accessible by anyone, consisting of:

b.1) The so-called "category lists" and telephone directories;

b.2) Internet Sites belonging to:

b.2.1) Interested parties and other related parties;

b.2.2) Public, governmental, territorial and local bodies, public agencies, as well as supervisory and control authorities, in relation to lists, registers and documents shared therein and containing information related to the performance of economic activities;

b.2.3) Trade associations and professional bodies, in relation to lists or registers of economic and entrepreneurial operators, shared on their sites;

b.2.4) Online telephone and category directory services;

b.2.5) Lists of common data present on geolocation applications;

c) databases from client companies and necessarily used to fulfill contractual obligations;

d) companies authorized to sell databases or transfer usage licenses of databases;

e) The interested party (the person to whom the data refers).

Measures to comply with the principles of the GDPR during the acquisition phase: When acquiring and recording personal data from the sources indicated above, Key-Stone takes appropriate and preventive measures to ensure that:

a) the information extracted is accurate and relevant with respect to the pursued purpose and the related personal data are processed in accordance with the principle of proportionality;

b) the specific source of data is indicated;

c) the same data are updated in their information reports.

This update is carried out by constantly consulting the Registro Pubblico delle Opposizioni <http://www.registrodelleopposizioni.it>. If the aforementioned register indicates that the interested party does

not wish to receive telephone calls for commercial or market research purposes, he/she does not wish to receive commercial communications via mail, sms or mms Key-Stone will proceed with the qualification of the data as indicated in the Registro Pubblico delle Opposizioni.

In the event that the data have been acquired directly by the interested party, the company proceeds to provide the envisaged information and to request the consent to the processing of the data, where necessary.

In acquiring and recording the personal data coming from Clients, Key-Stone adopts suitable and preventive measures and in particular it will proceed to stipulate a suitable agreement to be appointed "External data processor". In particular, in this case it will proceed to request constant updating of the data.

In the management of data included in databases for which Key-Stone has acquired the license, Key-Stone verifies that the transferor received suitable guarantees regarding:

- a) accuracy, relevance and proportionality of the information with respect to the aim pursued;
- b) the source of data;
- c) the obligation of the transferor to constantly update the data.

In the case of telephone contact to interested parties already present in the Key-Stone's DB, before the telephone contact, the list of the telephone numbers of the potential participants in the survey is submitted to RPO and then Key-Stone will proceed with the contact, always paying attention to provide the Information and requesting consent to carry out the interview.

If the contact is made by sending e-mails to interested parties already present in the Key-Stone DB because previously the same interested parties have issued an e-mail address for subsequent contact for the purpose of participating in interviews / opinion polls, Key-Stone will proceed with the acquisition of subsequent specific consent to the online interview.

Indication relating to the data: In particular, it is specified that for the purposes of the aforementioned activities, only the name-surname / e-mail address / telephone number of the aforementioned parties will be acquired. During the interviews, additional information may be acquired, which will be treated within the limits of that specific market research and then minimized or anonymized. The acquired data may also be processed for the management of the contractual / pre-contractual relationship and / or fulfillment of legal obligations relating to training and information mailing activities, to ensure, exercise or defend a right in judicial or extrajudicial proceedings. Additional data necessary for the management of the contractual activity may also be processed. With this in mind, we inform you that these data will be included, exclusively for the purposes mentioned above, in the company database. Within the company, the data will be known by the employees that need to carry out interviews and all the additional purposes indicated above. These treatments are anticipated, as indicated above, by precautions and measures in order to comply with the provisions of Regulation 679/2016. In any case, the interested party has the full right to exercise the rights listed below:

- to request access to their personal data;
- to obtain the correction or deletion of personal data or the restriction of the related processing;
- to object to the processing and portability of the data;
- to withdraw their consent;
- to submit a complaint to the supervisory authority (Privacy Authority).

It is possible to exercise one's own rights at any time by sending an email to [privacy@key-stone.it](mailto:privacy@key-stone.it) or by contacting the Data Protection Officer via email at [dpo@key-stone.it](mailto:dpo@key-stone.it). The data may be communicated to third parties who collaborate with the company and who are authorized to act on its behalf and with whom an "External data processor agreement" already exists or will be drawn up. The data will not be disclosed to anyone. The data will be processed for the entire period necessary for the management of the aforementioned purpose and for the legal obligations connected to them. Moreover, they will be kept for a period not shorter than the expected necessity.

In particular, for purposes related to both market research and training and information activities, the data will be processed for contract execution / pre-contractual measures / legal obligations / legitimate interest for **10 years** from the date of termination of the commercial relationship. For information purposes the data is processed up to the date of the request of the cancellation. In some cases, the data will be communicated to subjects, who will be qualified as external data processor, located outside the European Union. In this case, Key-Stone will comply with the provisions of art. 44 Reg. 679/2016 and in particular the External data processor will be subject to the binding rules set by the European Commission.

2) Creation of category lists split by product / professional sectors (so-called "category lists") referring to the dental sector.

For this treatment the data of the interested parties can be acquired from the following sources:

a) Public sources, i.e. public registers, lists or documents that can be accessed by anyone based on the current reference legislation, within the limits and with the methods that are established for the knowability, usability and publicity of data contained therein, including, by way of example and not exhaustively:

a.1) Italian Business Register;

a.2) "Telemaco Infocamere" companies.

b) All sources publicly and generally accessible by anyone, consisting of:

b.1) The so-called "category lists" and telephone directories;

b.2) Internet Sites belonging to:

b.2.1) Interested parties and other parties related to them;

b.2.2) Public, governmental, territorial and local bodies, public agencies, as well as supervisory and control authorities, in relation to lists, registers and documents shared therein and containing information related to the performance of economic activities;

b.2.3) Trade associations and professional bodies, in relation to lists or registers of economic and entrepreneurial operators, shared on their sites;

b.2.4) Online telephone and category directory services;

b.2.5) Lists of common data present on geolocation applications;

c) companies authorized to sell databases or transfer usage licenses of databases;

d) The interested party (the person to whom the data refers).

The aforementioned category lists could contain the following data (fields):

- Company name
- Address
- City
- Province
- Post code
- Telephone
- Disciplines of specialization such as Implantology / Orthodontics
- Number of hygienists working in the structure
- Number of dentists working in the structure

The data processing for the aforementioned purposes is based on the legitimate interest of Key-Stone aimed at the mere reorganization of public or easily accessible data, according to a logic aiming at knowing the market. From this point of view, for the purposes of the aforementioned data processing, the consent of the interested party is not compulsory, in consideration of the reasonable expectations that the same party may have regarding

the processing of public or publicly accessible data. Anyway, the Data Controller, for the purpose of processing the aforementioned category list has proceeded to a precise balancing of their interests with those of the interested party, excluding from the already mentioned list the information whose processing appears unjustified because prejudicial to rights and freedoms, or legitimate interests of the individual.

Based on these considerations, the processing of the information included in the category list must be considered fair and respectful of the principles of data protection.

Pursuant to art. 14 of European Regulation 679/2016, we also inform that:

1. The data may be disclosed to third parties to whom the aforementioned lists could be transferred for any reason. These third parties will be obliged to communicate to the interested party the receipt of the data within 30 days following receipt date;
2. Within the company it may be communicated to the staff of those offices in charge of managing the activities mentioned in the previous points, since these persons are in charge of data processing; personal data will not be transferred to any data controller of third countries without prior verification of a Commission's decision of adequacy or after the adoption of appropriate guarantees by the third party. The Data Controller will guarantee the updating of the data contained in the category lists through a constant verification of the sources and will keep them for the period necessary to carry out the activities referred to in the previous points. In any case, the interested party has the right to: (i) access their personal data, (ii) request the correction or (iii) the cancellation or (iv) limitation of the processing; (v) oppose against the processing.

The interested party has also the right to file a complaint with a supervisory authority.

The Data Controller can be contacted by phone at +39 011 311 9430 or by email at [privacy@key-stone.it](mailto:privacy@key-stone.it). The owner has appointed the DPO, which can be contacted via email at: [dpo@key-stone.it](mailto:dpo@key-stone.it).

This information is provided in implementation of art. 14 paragraph 4 letter b) of Reg. 679/2016 through publication in a sector magazine and on the website [www.key-stone.it](http://www.key-stone.it)