

## POLICY STATEMENT FOR THE RESERVED AREA

**AIM Italy S.r.l.** (hereinafter the “**Controller**” or “**AIM Italy**”), with registered office at Via Giuseppe Ripamonti No. 129, Milan (20141), tax identification number 00927270587, VAT number 00943621003, telephone +39 02 566011, fax +39 02 56609059 and email milan@aimgroup.eu in its capacity as Data Controller as provided in Article 13 of Regulation (EU) 679/2016 (hereinafter the “**Privacy Regulations**”) as subsequently amended and supplemented, collects and subsequently processes the personal data<sup>1</sup> of each applicant (hereinafter “**Data Subject**”), such as their username and password for access to the reserved area of the website [www.breathindigitalevolution.com](http://www.breathindigitalevolution.com) (hereinafter the “**Website**”).

An up-to-date list of Processors, if designated, can be provided at the request of the Data Subject.

The contact details of the Data Protection Officer (pursuant to Article 37 of the Privacy Regulations) designated by AIM Italy can be found at the following link <https://www.aimgroupinternational.com/company-information>.

### 1. Purpose and methods of processing.

The personal data of the Data Subject is processed during the course of the business of AIM Italy for the following purposes:

1. to permit access to all sections of the reserved area of the Website and the use of all the functions therein (e.g. access to webinars and live talks, their subsequent download, and viewing and download of various scientific and promotional materials, etc.);
2. for the fulfilment of specific obligations established by law, regulations or Community legislation;
3. subject to the relevant consent, the sending of AIM Italy documentation to update the Data Subject on all other projects, initiatives and events promoted by the company, either by automated means (e.g. newsletters, emails, text messages, mms, calls without an operator, etc.) or by traditional means of contact (paper mail and/or direct calls through an operator);
4. subject to the relevant consent, the Data Subject’s data is communicated to Chiesi Farmaceutici S.p.A., for independent processing for promotional purposes (in full compliance with the specifically applicable legislation), either by automated means (e.g. newsletters, emails, text messages, mms, calls without an operator, etc.) or by traditional means of contact (paper mail and/or direct calls through an operator). The said company will process the Data Subject’s data in the capacity of autonomous Data Controller, providing the Data Subject with information on the processing and enabling him or her to exercise his or her rights under Articles 15 et seq. of the Privacy Regulations.

Personal data is processed, under the authority of the Data Controller, by specifically designated persons who are authorised and instructed to process data pursuant to Article 29 of the Privacy Regulations and Article 2-*quaterdecies* of Legislative Decree 196 of 30 June 2003, as amended by Legislative Decree 101 of 2018 (hereinafter, the “**Privacy Code**”), by manual, electronic or telematic means, with a logic that is strictly related to the reason for processing, and in all cases in such a way as to ensure the confidentiality and security of personal data.

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<sup>1</sup> Pursuant to Article 4 of the Privacy Regulations, “*personal data*” is understood as: “*any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*”.

## **2. Legal basis for processing, nature of the consent given, and consequences of refusal.**

### ***2.1) Purposes indicated in paragraph 1, points 1 and 2 above.***

With regard to the purposes indicated in paragraph 1, points 1 and 2 above, the provision of personal data is mandatory and an essential requirement for access to all sections of the reserved area of the Website and the use of all functions within the area. Accordingly, the legal basis for the relevant processing is the access – requested by the Data Subject – to the reserved area of the Website, pursuant to Article 6, paragraph 1, letter b) of the Privacy Regulations.

### ***2.2) Purposes indicated in paragraph 1, points 3 and 4 above.***

With regard to the purposes indicated in paragraph 1, points 3 and 4 above, the provision of personal data is optional and failure to provide the relevant consent simply makes it impossible for the Data Subject to receive the documentation from AIM Italy necessary to keep him or her informed of all the company's projects, initiatives and events, and for his or her data to be forwarded to Chiesi Farmaceutici S.p.A. for promotional purposes (in full compliance with the specifically applicable legislation). Accordingly, the legal basis for the relevant processing is, in both cases, the express consent of the Data Subject, pursuant to Article 6, paragraph 1, letter a) of the Privacy Regulations.

## **3. Entities or categories of entities to whom personal data may be communicated and ambit of communication.**

In relation to the purposes of the processing indicated above, and within the limits strictly relevant to them, the personal data of the Data Subject will be communicated, in Italy or in any case within the EU, to the following entities for the purposes of his or her access to the reserved area of the Website:

- (i) public authorities, if required by law or on their request;
- (ii) the external entities and/or companies engaged by AIM Italy to perform services related, instrumental, or resulting from access to the reserved area of the Website;
- (iii) external consultants, if not designated in writing as Data Processors;
- (iv) with specific consent, to Chiesi Farmaceutici S.p.A., for its promotional purposes (in full compliance with the specifically applicable legislation).

The said entities, to which the Data Subject's personal data will or may be communicated (insofar as they are not designated in writing as data processors) will process the personal data in the capacity of Data Controllers pursuant to the Privacy Regulations, with complete autonomy from and extraneously to the original processing by AIM Italy.

A detailed and constantly updated list of these entities, indicating their respective headquarters, is always available from the registered office of AIM Italy.

## **4. Rights of the Data subject.**

Articles 15 et seq. of the Privacy Regulations grant the Data Subject the right to obtain:

- confirmation of the existence or otherwise of personal data concerning him or her, even if it has not yet been registered, and for it to be disclosed to him or her intelligible form;
- an indication of the origin of the personal data, the purposes and methods of its processing, the logic applied in the case of processing with the aid of electronic instruments, and the identification details of the data controller;
- the updating, rectification, supplement, deletion, transformation into anonymous form or blocking of data processed in violation of law – including data whose retention is not necessary for the purposes for which the data was collected or subsequently processed – and a

declaration that such operations have been notified including with regard to their content, to those to whom the data has been disclosed or disseminated, unless this requirement proves impossible or involves the use of means that are manifestly disproportionate to the protected right.

The Data Subject is also entitled:

- to withdraw his or her consent to the processing of personal data at any time (without prejudice to the lawfulness of processing based on consent given before the withdrawal);
- to object, in whole or in part, on legitimate grounds, to the processing of personal data concerning him or her, even if it is relevant to the purpose for which it was collected;
- to make a complaint to the Italian Data Protection Authority in the cases provided for in the Privacy Regulations.

Given that the consent given by the Data Subject to be contacted by automated means for the purposes indicated in point 3 of paragraph 1 also extends to traditional methods, the Data Subject may at any time contact AIM Italy, at the addresses indicated below, in order to exercise his or her right to object, even only partially, i.e. with respect to one or other of the methods specified.

For a detailed and constantly updated list of the entities to whom the personal data of the Data Subject may be disclosed, and to exercise the rights established in Articles 15 et seq. of the Privacy Regulations, in the manner established in Article 12 of the Privacy Regulations and within the limits established by Article 2-*undecies* of the Privacy Code, the Data Subject may contact the Data Controller at the address indicated above.

#### **5. Duration of treatment.**

Without prejudice to legal obligations, and with the exception of the receipt by AIM Italy of updates relating to all other projects, initiatives, and future events that it promotes, the personal data of the data subject will be preserved only for the duration of the requested service. In all cases, the Data Subject may request at any time the cancellation of the service, and therefore cease accessing the reserved area of the Website. Processing for promotional purposes will not continue for longer than 5 years from the date of provision of the said updates, if the Data Subject has not previously requested their deletion. Finally, notwithstanding these provisions, AIM Italy may retain certain parts of the Data Subject's personal data even after the processing has ceased solely for the purpose of defending or enforcing its own rights, in the cases provided for by law, or as a result of an order from a judicial or administrative authority.