

1. CONTROLLER AND CONTACTS

Personal data's Controller is Kardia S.r.l., specifically its legal representative Mr. Poretti Ezio – mail address: info@kardia.it – physical address: Via Cormons 18 – 20151 Milan (Italy).

2. INTERNAL PROCESSOR AND CONTACTS

Personal data's processor is ASM CONSULTING S.A.S., specifically its legal representative Mr. Aldo Maggiora – mail address: maggiora@kardia.it – physical address: Via Cormons 18 – 20151 Milan (Italy).

3. CUSTOMERS' DATA SUBJECTS AND PROCESSING PURPOSES

The Controller processes the following Customers' personal data:

- Identification and contact data;
- Bank account details;
- Any other information related to the contracts when Kardia S.r.l. is the contractor;
- Any identification and access data of the authorized users, when these are provided according to the contracts;
- Personal and health data of patients (for contracts related to software licenses).

Personal data are processed for the following purposes:

- Fulfil and/or meet the interested data subject's pre-contractual and contractual obligations, as well as tax, accounting and law obligations;
- Allow Kardia S.r.l.'s specialists to take fully care of the software's well-functioning, from the installation phase to their users' training, as well as any remote assistance;
- Manage any claim and complaints;
- Fulfil obligations provided by law and European Union's rules.

4. PROCESSING LEGAL BASIS

Kardia S.r.l. mainly processes its customers' data to performs contracts and/or relationships, to take steps at the request of the data subject prior to entering into a contract, as well as to comply with legal obligations (article 6, paragraph 1, letters b) and c) of GDPR).

Moreover, we process your data to pursue our legitimate interests aimed at managing, protecting and improving our services (article 6, paragraph 1, letter f) of the GDPR).

5. PROCESSING METHODS, KEEPING CRITERIA AND TIMING

Personal data processing is carried out through the activities mentioned in article 4 of the EU Regulation no. 679 of 2016, specifically data collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure or destruction. Your personal data will be kept for no longer than is necessary for the purposes for which they were collected or subsequently processed, pursuant to article 5, letter e) of the EU Regulation no. 679 of 2016. In particular, administrative, accounting, tax, statutory documentation required by EU regulations and laws will be kept in our IT and paper archives for 10 years since their issuance. Should you interrupt or relationship, Kardia S.r.l. will keep only data explicitly required by law and only for the time required by the law itself.

6. DATA ACCESS

Data provided by you will be processed by properly authorized internal employees, monitored by the above-mentioned Controller and external processor, for example: IT companies, law firms, and independent controllers, such as financial institutions for collection management, and Judicial Authorities in case of legal actions.

7. DATA COMMUNICATION AND DISTRIBUTION

Without needing your permission (pursuant to article 6 of the EU Regulation no. 679 of 2016), the Controller can communicate your data for the purposes mentioned in article 3 above to control and inspection bodies, tax authorities and any other party to which the communication

is mandatory by law and for the above-mentioned purposes. These parties will process data as independent controllers. Your data will not be published.

8. PERSONAL DATA TRANSFER ABROAD

Personal data processing and storage will happen on Italian-based servers and clouds. Data will not be transferred outside the European Union.

9. DATA PROVISION'S NATURE AND CONSEQUENCE FROM REFUSAL TO REPLY

Given that the processing purposes mentioned in article 2 above are strictly related to the fulfilment of contracts and agreements the data subject signed, to the compliance to legal requirements, and to pursue the Controllers' legitimate interests pursuant to article 6 of the EU Regulation no. 679 of 2016, personal data processing is legal according to letters b), c) and f) of the Regulation itself, therefore Kardia S.r.l. is not obliged to obtain consent to data processing. However, missed data provision could prevent partially or totally the fulfilment of agreements in force.

10. DATA SUBJECT'S RIGHTS

Pursuant to articles 15, 16, 17, 18, 19, 20, 21, 22 of the UE Regulation no. 679 of 2016, the data subject's rights are as follows. 1. The data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, although they are not stored yet, and their communication in a form that he or she can understand. 2. The data subject has the right to access the following information: personal data source, processing purposes and methods, meaningful information about the logic involved for data processed through electronic means, the identification data of the Controller, Processors and responsible pursuant to article 5, paragraph 2, the recipients or categories of recipient to whom personal data have been or will be disclosed as Country designated representative, responsible or in-charge persons. 3. The data subject has the right to obtain: a. the data update, rectification, and, when he or she is interested in it, their completion; b. erasure, the transformation into anonymous form, or the denial of data processed violating law, including data whose keeping is not needed for the purposes data were collected or subsequently processed; c. certification that the parties data were communicated or disclosed to acknowledge the activities mentioned in points a. and b., including their content, except when this would be impossible or require clearly disproportionate means compared to the right protected; d. a copy of the data we possess in a common format; e. restriction of processing their personal data or oppose it, partially or totally, for legitimate reasons to the personal data processing, although related to the purpose for collection. Moreover, the data subject has the right to: f. withdraw their consent in any moment, without interfering with the legal data processing before the consent withdrawal; g. submit a claim to a Supervisory Authority; h. obtain the update, rectification and completion if data; i. opposing, both totally or partially, to their data processing for legitimate reasons, although related to the data collection. Written requests shall be submitted via registered mail with return receipt or e-mail to the Controller's registered office specified in paragraph 1 and 2 of this disclaimer. It is possible to require to the Controller a certification of the fact that requests were properly solved and communicated to parties data were previously communicated and disclosed to. The data subject can also delegate third parties with a signed power of attorney attached to the copy of an identity document or signed in front of a representative. The Controller is obliged to follow up with the request by 15 days or 30 days if the feedback gives rise to problems; in any case by 15 days, delay in follow up will be motivated.