

## **PRIVACY POLICY for Instagram profile: Fidia Aesthetic care**

This privacy policy, drafted pursuant to Article 13 of EU Reg. 2016/679 (GDPR), applies to personal data processing carried out in relation to the Instagram profile: Fidia Aesthetic care.

### **Data Controller and contact data**

The Data Controller is Fidia Farmaceutici S.p.A. with registered office in Via Ponte della Fabbrica 3/A – 35031 Abano Terme (PD).

If you have any questions about the processing of your personal data or to exercise your rights regarding privacy, you can contact our Data Protection Officer in the following ways: by sending an email to [dpo@fidiapharma.it](mailto:dpo@fidiapharma.it) or by mailing a letter to: Via Ponte della Fabbrica 3/A – 35031 Abano Terme (PD), FAO: Legal Department and Data Protection Officer. When you send us a request, remember to include your contact details so we can identify you and get back to you.

### **Purpose, personal data processed and legal basis, processing methods, retention time.**

We process:

- 1) Data to allow the interaction with our informative contents and the access to our resources presented on this Instagram profile (examples: your intentional access to our website through a hyperlink on the page; to receive our answer to comments/requests left on this page, where the feature to write comments is enabled, ...). In this case, the legal basis for the processing consists in the provision of the requested service (access to hyperlink; receive our reply comment if the feature is enabled...), in doing this we process essential personal data to provide the specific service. This data processing occurs directly on the platform and with the resources made available by Instagram. Fidia does not conduct any further retention on the processed data, other than the one carried out automatically by Instagram.
- 2) The so-called 'Insight' as made available by Meta of which Instagram is part, allows to know, aggregate data, not attributable to a single person and statistical information of users' interaction events with our Instagram page. These events concern: actions like viewing a page, interacting with an "Instagram Story", following or stopping following our page, etc. Please refer to Instagram's Privacy Policy for full details on this aggregated data. The legal basis of this processing is our legitimate interest in knowing what occurs in terms of interactions with our Instagram page, to improve the performance of the page and our content, considering that these Insights provide only aggregate data. Fidia treats this data strictly for the time necessary to pursue the above-mentioned objectives.

All data will be processed mainly in electronic format and collected and processed by applying the technical and organizational measures consistent with a level of security appropriate to the risks, taking into account the state of the art and the implementation costs and, where applicable, the security measures prescribed by specific legislation.

The personal data processed will be retained for a period of time not exceeding that required for achievement of the purposes indicated above and in compliance with any terms provided for by law, except for the need to keep it for a longer period of time following requests from the competent authorities for the prevention and prosecution of crimes or, in any case, to assert or defend a right in court.

### **Data recipients and transfers**

Personal data is processed by personnel specifically authorized by Fidia as Data Controller, as well as by third parties, also possibly established in countries outside the European Union, only when this is necessary for the operational needs of the services described in this notice.

Should it be necessary to involve third parties established in countries outside the European Union, the appropriate applicable safeguards will be adopted on a case by case basis for the related transfer abroad, pursuant to Articles 44-49 GDPR.

## **Exercise of privacy rights**

In relation to the processing of personal data mentioned above, you may at any time exercise the rights provided for by the Articles from 15 to 22 of GDPR, where applying to the services described in this policy, by addressing your request to the contact details of Fidia Data Protection Officer listed at the beginning of this text and, if you deem appropriate, lodge a complaint to the Supervisory Authority (Personal Data Protection Authority).

## **Additional clarifications**

We are aware of who are the followers of our Instagram page and who put a 'like' on our posts because they intentionally make public their interest in our informative content.

Furthermore, to allow healthcare professionals who are Instagram users and who belong to predefined categories in terms of age, gender, and geographic area, to know our brand and its lines, we commission Instagram with sponsored campaigns, and as a result those who fall into these categories may see one of our 'sponsored posts' on their Instagram page, but under no circumstances do we come into contact with their personal data, which remain in the exclusive controllership of Instagram. Insofar one of these people decides to click on our banner in which there are hyperlinks to our online resources (typically: website), on these resources will be initiated our personal data processing (if, for example, the person decides to view the pages of the site, fill out a form,...), for which it will be applicable the privacy policy present on our relevant online resource.

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