

## **Privacy statement for subscribers of the Direct Mailing service for informational and promotional purposes offered by Tokuyama Dental Italy Srl.**

### **Why are you receiving this privacy statement?**

This privacy statement, therefore, is to inform you on «why» and «how» your personal data will be processed in the use of the informational and promotional Direct Mailing service on products, use techniques, courses and events, updates on the brand and on the team offered by Tokuyama Dental Italy Srl.

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### **What is personal data?**

Personal data is a first name, last name, contact details, email address, online identifiers such as IP address and any data or information that can be related to a specific individual.

### **What does Data Controller mean?**

A Data Controller is the company/organisation that decides «why» and «how» your personal data needs to be processed.

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Tokuyama Dental Italy Srl is the data controller for the personal data you provide for informational and promotional Direct Mailing purposes.

### **What obligations does Tokuyama Dental Italy Srl have as Data Controller?**

The legislation on personal data protection obliges us to ensure that your personal data is processed only in a lawful, correct and transparent manner and in line with the principles and requirements of the European Data Protection Regulation and Italian national laws.

### **Furthermore, we must inform you that you have the following rights:**

- to be informed about what we do with your data and how we do it;
- to revoke the consent at any time without prejudice to the lawfulness of the treatment based on the consent given before the revocation;
- to access your personal data;
- to object to the use of your personal data;
- to request that we rectify any information we hold about you that is inaccurate;
- to request the restriction of processing of your data or the deletion of any personal data we hold about you without valid justification;
- to receive, in a structured format, commonly used and readable by an automatic device, the personal data concerning you and which we process for the purpose of executing a contract
- to be free from automated decision-making processes;
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The exercise of data protection rights is free of charge.

Requests can be made verbally or in writing.

You are not forced to use a particular format for your request.

However, we will need to carry out checks on your identity to ensure that your request is genuine and that your personal data is not being sent to someone pretending to be you.

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To exercise your rights, you can send the related requests by writing to one of the following addresses:

E-mail: [info@tokuyama.it](mailto:info@tokuyama.it)

PEC: [tokuyamadentalitaly@legalmail.it](mailto:tokuyamadentalitaly@legalmail.it)

The right to lodge a complaint with the competent personal data protection supervisory authority or take legal action.

If you are not satisfied and think that we have not processed your data in a lawful, correct and transparent way or if you think that we have violated your rights, you have the right to lodge a complaint with the competent Supervisory Authority in the Member State in which you habitually reside or work or of the State in which the alleged violation of the Regulation occurred.

In Italy, the competent supervisory authority is the Authority for the Protection of Personal Data, [www.garanteprivacy.it](http://www.garanteprivacy.it)

Further information about the Data Controller

The Data Controller is Tokuyama Dental Italy Srl, 01760210227, with registered office in Sandrigo, via Chizzalunga, 1, telephone: +39 0444 65 96 50, E-mail: [info@tokuyama.it](mailto:info@tokuyama.it), PEC: [tokuyamadentalitaly@legalmail.it](mailto:tokuyamadentalitaly@legalmail.it).

What is the personal data that Tokuyama Dental Italy Srl must process to provide the service, what is the legal basis of the processing, for what purposes is it used and for how long is it kept?

<b>Informational and promotional Direct Mailing</b>	
Personal data processed	<p><b>Name, surname, email address</b> We collect this data to be able to identify you as a subscriber of the service and the Direct Mailing service for informational and promotional purposes.</p> <p><b>Business phone number</b> We collect this data in order to be able to contact you, #as a subscriber of the s We will not use this data to send text messages.</p>

	<p><b>Company name, address (street, zip code, city, province, region, country), geographical area of work or of the employer</b>  We collect this data as we need to associate you as a service subscriber with a specific dental practice and, more generally, with the name and company you work for.</p> <p><b>If this solution is welcome, we may also use the address to send you informative newsletters to the company address.</b>  Role, specific discipline, percentage of specific activities, number of dental chair employees, products used, products of potential interest, willingness to receive a demo product.  Role, specific discipline, percentage of specific activities, number of dental chair units, number of employees, products used, products of potential interest, willingness to receive a demo product.  We collect this data to make sure that our promotional offer meets all your needs.</p> <p><b>IP address and other online identifiers</b>  We collect this data through the computer systems and software procedures used to operate the web portal of our service providers for the management of newsletters and contact databases.</p>
<p><b>Purpose of the processing</b></p>	<p>Through this service, Tokuyama Dental Italy Srl wants to make sure it can provide you with as much information as possible to use Tokuyama products correctly and achieve the best result.</p> <p>To do this, it is our intention to send technical and promotional updates through the channels of your preference.</p> <p>Specifically, the topics covered will be:</p> <ul style="list-style-type: none"> <li>• product range</li> <li>• tutorials and techniques for using the products</li> <li>• new product launches</li> <li>• case histories</li> <li>• events</li> <li>• courses</li> <li>• updates on the brand</li> <li>• updates on the team</li> </ul>
<p><b>Legal basis</b></p>	<p>Tokuyama Dental Italy Srl processes your personal data using the following legal basis:  The processing is necessary for the pursuit of the legitimate interest of the data controller by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child - GDPR, art. 6(f)</p>

	<p>Where the legal basis of legitimate interest cannot be applied, Tokuyama Dental Italy Srl uses the following legal basis: The data subject has given his/her consent to the processing of his/her personal data for one or more specific purposes - GDPR, art 6. (a)</p>
<p><b>Description of the legitimate interests of the Data Controller (or of third parties)</b></p>	<p>Since you have participated in a course, an event, a fair, have subscribed to the newsletter or have explicitly requested information from one of our team members by providing your contact details, Tokuyama Dental Italy Srl believes that you have expressed a clear interest in Tokuyama products and that it is therefore legitimate to send you communications regarding products similar to those for which you have expressed an interest.</p>
<p><b>Recipients of personal data</b></p>	<p>Yes</p>
<p><b>Categories of recipients of personal data</b></p>	<p>For the purposes related to informational and promotional Direct Mailing, we share the personal data described with the following categories of recipients:</p> <ul style="list-style-type: none"> <li>• Providers of services for managing newsletters and a contact database.</li> </ul>
<p><b>Identity of recipients of personal data</b></p>	<p>Mailchimp - <a href="https://mailchimp.com">https://mailchimp.com</a></p>
<p><b>Role of recipients of personal data</b></p>	<p>The recipients process the data received from Tokuyama Dental Italy Srl as Data Processor.</p>
<p><b>Transfer to third countries</b></p>	<p>Personal data is transferred to recipients outside the European Union.</p>
<p><b>Third country description</b></p>	<p>United States of America.</p>

<b>Mechanism used for transnational data transfer</b>	Standard Contractual Terms.
<b>Additional measures to ensure data protection</b>	<p>In compliance with the GDPR regulation, the service provider offers additional data protection measures.</p> <p>A list of additional data protection measures is available from the following links: <a href="https://mailchimp.com/it/gdpr/">https://mailchimp.com/it/gdpr/</a> <a href="https://mailchimp.com/it/about/security/">https://mailchimp.com/it/about/security/</a></p>
<b>Storage times</b>	<p>For the specific purposes of Direct Mailing, upon unsubscribing, the data will be eliminated from our mailing-list within a maximum of 30 days.</p> <p>If you are already a customer and have already purchased one of our products, your data will anyways be stored in the personal data database for administrative management purposes but will not be used for Direct Mailing purposes.</p>