

**AUTHORISATION FOR THE PROCESSING OF PERSONAL DATA
PURSUANT TO
THE GDPR – GENERAL DATA PROTECTION REGULATION, EUR
2016/679**

Under the new General Data Protection Regulation (GDPR), the processing of the data that you are entrusting to us will abide by the principles of accuracy, lawfulness and transparency and the protection of your privacy and your rights.

By submitting your personal data, you authorise **PRIMA Lab SA**, with headquarters in Balerna (Switzerland), Via Antonio Monti 7, to record and store your personal data for the purposes of and in accordance with the procedures and duration described below. You also agree that your personal data will be recorded and stored in the Schengen Area.

DATA CONTROLLER

Data Controller:

PRIMA Lab SA

Via Antonio Monti 7

6828-CH Balerna (Switzerland)

T **+41 91 605 1030**

email **privacy@primahometest.com**

TYPE OF DATA SUBJECT TO TREATMENT

The personal data referred to in this statement, whose processing requires your consent on behalf of PRIMA Lab SA, are exclusively those required for account registration and/or the first order made on the PRIMA Home Test web site: name, surname, email address, shipping address and gender. When making an order, the payment methods you can choose from are Post Finance, credit card and PayPal, which require essential information for completion of the payment.

Any additional data that you provide to us through our Customer Care service when you need information, clarification or help with registration, on purchases or products or to place an order or receive an offer are stored by PRIMA Lab SA in its own data management IT systems and are processed in accordance with the principles of accuracy, lawfulness and transparency.

Under Article 25 of the GDPR, in accordance with the principle of "data minimisation", only information deemed necessary and relevant for the purposes described in the PRIMA Lab SA privacy policy will be stored and processed.

The processing of personal data for subscription to the newsletter on the www.primahometest.com website

If a subscription to the newsletter on PRIMA Home Test website falls outside the scope of your consent to the processing of personal data, PRIMA Lab SA shall store only your email address in order to send you material regarding news/health advice, marketing and promotions on PRIMA Home Test products. PRIMA Lab SA shall ask your consent for the storage of your email address.

Otherwise, PRIMA Lab SA reserves the right to also use other personal information, stored at the time you created your user account or made your first order on the PRIMA Home Test website, exclusively for the purposes described in this statement.

PURPOSES AND METHODS OF THE PERSONAL DATA PROCESSING

Your personal information will be stored and used by PRIMA Lab SA for the following purposes:

- Direct communication with you using your email address. PRIMA Lab SA reserves the right to send you an email:
 - Following the creation of your account on the PRIMA Home Test website to confirm your registration;
 - Following each of your orders, to confirm the information, the content of the order and to send you the order confirmation (if applicable);
 - If you have used the customer service because of a problem with a PRIMA Lab SA product or service, 30 days after the closure of the complaint procedure;
 - Based on your consent, with the content of the monthly newsletter, strictly related to news/health advice, marketing and promotional information on PRIMA Home Test products. If you have given your consent also to the processing of personal data, you may receive personalised content, where "personalised" means modelled on information you have entered in your account on the PRIMA Home Test website (gender, date of birth, habits - smoking, sport - area of interest, weight, height, children), or on information you have given to Prima Lab SA staff for other purposes (e.g. commercial agreements, contacts).
 - If you give consent only to the newsletter, you will receive through your email news/health advice, marketing and promotional information on PRIMA Home Test products.

If you have not given your consent to the processing of personal data:

- during registration on the PRIMA Home Test website, PRIMA Lab SA reserves the right not to allow you to create your account and make an order, since the non-storing of your data prevents the completion of the operations starting from the website itself.
- In other instances, PRIMA Lab SA reserves the right to discontinue communications with you until you change your consent status via notification to the data controller

In both cases, PRIMA Lab SA guarantees that it will not store, use or disclose your personal data to third parties.

Disclosure to third parties

Your personal data will be shared with third parties outside of PRIMA Lab SA exclusively for the processing of orders, in order to complete payment (invoicing data obscured) and shipping (shipping data) processes. Your data will also be shared when you purchase the PRIMA Home Test food intolerance test and subsequent analysis request, in which a laboratory in Italy analyses your sample and writes up the report with the test results (name, surname, email, address and language in which to receive the results).

PRIMA Lab SA will not disclose your personal data to persons or third-party companies for commercial or marketing purposes.

Relationships and sharing of sensitive information with third parties necessarily involved in communication and advertising procedures and processing of orders (i.e. Google, Facebook, Instagram, Amazon) are based on the privacy policies of said third parties, to whom you gave your consent when you created your accounts on those platforms. Consequently, PRIMA Lab SA shall not be held responsible for any anomalies or breaches in the processing of your data at times when the above mentioned third parties are found to be liable.

PERIOD OF DATA STORAGE

Once your data have been recorded, they are stored in a database in the European Union; a copy of the database is also held at the headquarters of the company PRIMA Lab SA of Balerna (Switzerland) solely for backup purposes. Access to the database and to the backup is limited and regulated by a strict internal procedure at PRIMA Lab SA.

Your personal information will be stored until such time as you decide to delete it (by communicating your decision to the data controller through the channels defined at the beginning of this statement), with the exception of documents that are legally required (Swiss Code of Obligations, CO; RS 220) to be maintained for at least 10 years.

The information that you ask to be cancelled will be permanently deleted from the PRIMA Lab SA storage systems within 3 working days from your request.

Loss of data

PRIMA Lab SA has put in place a "Disaster Recovery" procedure: a set of automatic operations applied in the event of data loss due to predictable "risks", including cyber-attacks and environmental disasters. This procedure means that in these circumstances we can recover your data in the minimum time possible in relation to the damage suffered.

This procedure shall also apply in the case of accidental data loss by an operator within PRIMA Lab SA.

RIGHTS OF THE DATA SUBJECT

In accordance with Articles 15-22 of the GDPR, you may at any time exercise the following rights related to the processing of your personal data:

- View, update, change or delete the personal data you have supplied to PRIMA Lab SA by accessing your profile on the PRIMA Home Test or by contacting us using our assistance service on the part of the data controller.
- Obtain a copy of your recorded personal data so that they can be transmitted to third parties in accordance with the principle of data portability (Article 20 GDPR);
- Limit the processing of your personal data by contacting us using our service on the part of the data controller

In this way, the privacy management of PRIMA Lab SA allows consent to personal data processing, subscription to the newsletter and storage of cookies to be divided and made independent, giving you the opportunity to choose and change your choice at any time.

- Withdraw your consent and therefore oppose the processing of your data, by contacting us using our service on the part of the data controller.
- To not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affecting your person.

All disputes arising from this document or otherwise connected thereto, concerning the validity, nullity or breach of the agreement will be resolved definitively by arbitration in accordance with the Swiss regulation on international arbitration of the Swiss Chambers of Commerce in force on the date on which the arbitration request is filed in accordance with said regulation.

There shall be one arbitrator, the place of the arbitration shall be the Chamber of Commerce, Industry, Crafts and Services of the Canton of Ticino (Lugano) and the arbitration proceedings shall be conducted in English.

COOKIE POLICY of the www.primahometest.com website

Cookies are pieces of information that a website places in your navigation device when you visit a page. They are valuable tools that allow companies to continuously improve their products and offer services that are more efficient and have features that better suit the real needs of the user. They may involve the transmission of information between the website and your device, and between it and other sites that work for PRIMA Lab SA or operate privately. Your consent is also required for the storage of certain categories of cookies.

Technical cookies

Technical cookies are used for the sole purpose of transmitting communications over an electronic communications network, or as strictly required to the IT company service provider, when requested by the subscriber or user in order to provide the service. Without these cookies, it will not be possible to handle and record, for non-exhaustive example, user authentication, access to the reserved area of the website, the contents of online shopping carts, electronic invoicing or the completion of purchase order processes. Since technical cookies are essential for the correct functioning of a web site, they can also be used without the prior consent of the user.

Profiling cookies

Profiling cookies are used to track the user's web browsing and create profiles based on their tastes, habits, choices, etc. These cookies can be used to transmit advertising messages to the user's computer in line with preferences expressed by the user when navigating online. Your consent is required for this type of cookie, as explained below.

Third party cookies

Third party cookies are generated and managed by persons other than the administrator of the web site on which the user is navigating (there is generally a contract between the site owner and the third party). In the case of PRIMA Lab SA it is: Google Analytics.

Third party cookies are not under the control of PRIMA Home Test, so for more information on how the third party uses the cookies, we recommend that you visit the third party website.

Google Analytics uses cookies to anonymously collect and analyse information about PRIMA Home Test website usage behaviour (including the user IP address). This information is collected by Google Analytics, which processes it in order to draw up reports for PRIMA Lab SA operators concerning activities on the websites. This site neither uses nor permits any third parties to use Google Analytics analysis tools to monitor or collect personal identification information. Google will not associate your IP address with any other data held by Google or seek to link an IP address with the identity of a user.

Profiling and third party cookies require your consent, so as soon as you visit the home page of the PRIMA Home Test website you will see a box at the bottom of the page, asking you to give or deny your consent and also providing a link to information on cookies:

- If you decide to give your consent, PRIMA Lab SA will store your IP address and your navigation preferences within the site, exclusively for internal statistical and remarketing purposes;
- If you deny your consent, PRIMA Lab SA reserves the right to use your anonymised* data for internal statistical purposes.

** anonymised: this is information that has been divested of any possibility of being associated with a precisely identifiable physical person One example is emails that are transformed into an alphanumeric string. The anonymised information thus becomes to those who use it.*

You may at any time change or withdraw your consent within your user account or by contacting the data controller at the addresses listed at the beginning of this statement.

PRIMA Lab SA reserves the right to make changes to this statement and its own privacy policy. The user agrees to be bound by any such future revisions and therefore agrees to periodically visit this page to be informed of any changes.