

## PRIVACY POLICY

This privacy policy (hereinafter, “**Privacy Policy**”) refers to [www. anaemicourse.com](http://www.anaemicourse.com), including dedicated and reserved areas for registered users (hereinafter, the “Site”) and describes the activities and means of personal data processing fulfilled by VISIONPLUS (hereinafter, “VISIONPLUS”), through the Site.

VISIONPLUS recognizes the importance of its users’ privacy and commits itself to respecting it. VISIONPLUS processes user’s personal information (“**Personal Data**”) when the user visits the Site and uses the services and functionality on it. The Privacy Policy has been drafted in accordance with Recommendation no. 2/2001, adopted on 17 May 2001 by the Data Protection Working Party – Art. 29, related to the minimum requirements for the online data collection in the European Union and also represents information to interested parties in compliance with Art. 13 of General Data Protection Regulation (“**GDPR**”) and the local applicable law (together, “**Privacy Law**”). The Privacy Policy specifies who the Data Controller is, who controls and manages the Personal Data collected and processed through the Site, what personal information is collected, for what purposes and by which means the Personal Data are processed, the scope of communication to third parties and the possible transfer abroad, the security measures adopted to protect and defend such data and the means by which the user can verify the processing of data concerning him/her and exercise the rights recognized by the Privacy Law.

However, this information is only made for the Site and for the activities and services provided by VISIONPLUS also through its own Data Processors and not for any other websites that may be consulted by the user through links and/or activities carried out by third parties. In case of other websites’ consultation, please refer to the respective Privacy Policy.

### 1. TYPES OF PROCESSED DATA

#### 1.1 Navigation data

Visiting and consulting the Site does not generally involve collection and processing of user’s Personal Data. The Personal Data processing of users who visit and consult the Site is limited to the so-called navigation data which transmission is necessary for the functioning of computer systems and of programs essentials for the operation of the Site but which, by their very nature and in conjunction with other data, may permit the identification of users. This category includes, for example, the IP addresses (Internet Protocol) or the domain names of the computer used to visit the Site, as well as other parameters concerning the operating system used by the user to connect to the Site. The collection of Navigation data occurs automatically and inevitably and can only be used to obtain statistical information on the use of the Site and to verify its proper functioning. If expressly requested, such data may be used by the Public Authority to ascertain liability in the event of computer offenses committed against the Site and/or third parties, in accordance with the procedures in force at the competent Authorities. Except for this possibility, navigation data described above are only temporarily kept in compliance with the applicable regulations.

#### 1.2 Data voluntarily provided by individual users

In addition, VISIONPLUS collects and processes Personal Data voluntarily provided by individual users that consist of those data collected through the sending of e-mail, the interaction with the Site’s features, the request for services offered by the Site, the compilation of other specific format for access to reserved sections of the Site (e.g. suppliers portal). Personal Data that VISIONPLUS collects and processes include name, gender, place and date of birth, nationality, contact information such as addresses, phone numbers, e-mails and other information.

## **2. MEANS AND PURPOSES FOR PROCESSING PERSONAL DATA**

The Data will be processed both manually and with the help of electronic instruments to respond and manage requests for information and/or materials of the user, questions, communications or feedback from users; to provide services rendered on the Website, including registration and updates through price sensitive press releases, presentation, interim reports, annual reports, and to manage the initiatives organized through the Site; to carry out recruitment and staff selection activities; for the management of sales activities and sales and after-sales services, such as administrative and accounting activities, return and guarantee management, fraud prevention, customer relationship management, including compliance with legal obligations, regulations and Community legislation (including anti-money laundering legislation) and for the rights' enforcement through legal action.

Personal Data will be stored for a period of time not exceeding what is necessary to achieve the purposes for which they have been collected and, in any case, not longer than the one provided for by the applicable regulations.

## **3. NATURE OF PERSONAL DATA GRANTING**

The Personal Data granting for the purposes mentioned in point 2 above, is necessary to allow VISIONPLUS to respond to requests for information, to provide the services requested through the Site, including registration, to manage sales activities and after-sales services; in the event of non-submission of Personal Data for the purposes referred to in point 2, VISIONPLUS will not be able to answer to requests for information, to provide the services requested through the Site, to manage sales activities and after-sales services.

## **4. PERSONAL DATA DISCLOSURE**

Personal Data are accessible to the Data Processor indicated below, to the other persons who will act as external Controllers appointed by VISIONPLUS and, in their quality as Persons in charge of the Processing, to the staff of VISIONPLUS involved in the provision of services and features from time to time offered by VISIONPLUS according to criteria of need.

Personal Data may be disclosed to agencies, authorities, public institutions and legitimate recipients in compliance with laws and regulations; they may be made accessible to self-employed professionals and collaborators, also organized in associated form, third parties suppliers of professional and technical service for the for processing purposes referred to in paragraph 2 that assist VISIONPLUS in legal, tax, social security, accounting and/or organization's field, who will act as Data Processors or Persons in charge of the Processing, as the case may be, without prejudice to the adoption of Personal Data security and protection measures pursuant to current legislation.

Personal Data may also be disclosed to third parties in the event of extraordinary transactions (e.g. mergers, acquisitions, transfer of business, etc.) by VISIONPLUS. Only the information necessary to perform their respective functions will be provided to such those persons. Such third parties will commit to use the information received only for purposes for processing specified above, to keep them confidential and secure and to comply with the protection of Personal Data required by law and any instructions given by VISIONPLUS.

Personal Data may also be transferred abroad to persons established in countries that are not members of the European Union that could not guarantee an adequate level of protection pursuant to the Privacy Law. In such cases, VISIONPLUS transfers Personal Data to such third countries after the adoption of the measures laid down in Art. 44 and subsequent of the GDPR in order to legitimate the transfer and ensure adequate protection to transferred Personal Data. Persons who receive user's Personal Data may process them as Controllers, Processors and/or Persons in charge of the Processing, as the case may be.

The complete and updated list of Data Processors will be provided on request by contacting VISIONPLUS at [medicaleducation@visionplus.it](mailto:medicaleducation@visionplus.it).

## **5. AUTOMATIC DATA COLLECTION MECHANISMS - COOKIES**

The Site uses Cookies and other technologies to read and/or store information on the user's device. In order to provide a detailed description of these technologies, please refer to the Cookie Policy, here fully referenced.

## **6. USER'S RIGHT**

User may exercise at any time the rights to which he/she is entitled to pursuant to Articles 15 – 22 of the GDPR including, for example, the right to obtain confirmation of the existence or not of Personal Data relating to him/her, verifying its content, source and accuracy, requesting its integration, updating, rectification, deletion, transformation into an anonymous form, portability. The user may object in whole or in part, or ask for the restriction of the processing of data for legitimate reasons.

For any question or request about the processing of Personal Data and for exercise the rights granted by the GDPR, the user may contact VISIONPLUS at the following address: [\[medicaleducation@visionplus.it\]](mailto:medicaleducation@visionplus.it).

## **7. AMENDMENTS AND UPDATES OF PRIVACY POLICY**

The Privacy Policy is subject to amendments and updates and the version currently in force is that published on the Site. Amendments of the Privacy Policy are communicated through publication on the Site. Please periodically check the Privacy Policy to be informed of any changes.

## **8. DATA CONTROLLER AND DATA PROCESSOR**

The Data Controller is VISIONPLUS S.R.L. based in Via Cortelonga 14 – 20900 Monza (MB) – Tel. +39 039 2326183

The Data Processor is Samantha Ceccardi, domiciled at the headquarters of the Controller and available at the following e-mail address [\[medicaleducation@visionplus.it\]](mailto:medicaleducation@visionplus.it).