

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA
issued pursuant to articles 13 of Regulation (EU) 2016/679
General Data Protection Regulation
HEALTHCARE PROFESSIONAL - ONBOARDING

Below we provide to healthcare professionals, a brief description of the essential characteristics of the processing of their personal data carried out by **Venous lymphatics World International Network Foundation (vWIN) - ONLUS**, with registered office in ROVIGO (RO), Via Giuseppe Mazzini 12, acting as the Data Controller (hereinafter referred to as the "Controller"). The processing will be carried out in compliance with Regulation (EU) 2016/679 - General Data Protection Regulation (the "Regulation").

1- Identity and contact details of the Data Controller

The Data Controller is **Venous lymphatics World International Network Foundation (v-WIN) - ONLUS**, with registered office in ROVIGO (RO), Via Giuseppe Mazzini 12.

Contact details are:

- Email: info@v-registry.com
- Pec: cert@pec.vwinfoundation.com
- Phone number: +393498012304

2 – Contact data of the DPO

The appointed DPO can be contacted at the email: legal@v-regsitry.com.

3 - Data Source

Personal data subject to processing activities are acquired directly from the Data Subject.

4 - Type of Data Processed

The Data Controller collects and processes data of data subjects for the purposes specified in Section 5 below. The following is a sample list of the data processed:

Common personal data

- Contact data (email address).

For the operation and navigation of the website we process:

- Browsing data (including, for example, IP addresses, the URI/URL notation addresses of requested resources);
- Data that may be collected through cookies, for which please refer to the specific cookies policy.

5 - Purpose and legal basis of data processing

1. To enable the data subject to **register and create his/her own account** within the web app. This processing is necessary for the **execution of pre-contractual measures**.
2. For **ascertaining, exercising or defending, including in court**, the rights of the Data Controller, related to the **legitimate interest** of the Data Controller.
3. To **comply with legal obligations, regulations, and EU legislation** to which the Data Controller is subject.

6 - Data processing methods

The Data will be processed with the support of computerized means, in compliance with the Regulations, and, in any case, in such a way as to ensure the security and confidentiality of the data and prevent unauthorized disclosure or use, alteration or destruction through efficient security measures of a physical, logical and organizational nature.

Personal data are **stored at servers present in the territory of the EU** where maximum compliance with the regulations placed on the protection of personal data is guaranteed.

On the other hand, data of citizens of Russian nationality are stored in databases located in the territory, as imposed by the Federal Law 242-FZ.

7 – Data recipients

The data may be brought to the attention of (limited to their respective sphere of competence and for the sole purpose of implementing the described purposes):

- a) subjects to whom the communication of data is necessary for the operation of the web app, who act as Data Processors, by virtue of written agreements entered into with the Controller.
- b) appointees and persons Authorized by the Data Controller who have committed themselves to confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., employees and contractors of the Data Controller);

In order to comply with legal obligations, regulations, EU legislation or contractual obligations, as well as to exercise any rights in court, the data subject's data may be accessed by the following third parties, such as:

- I. tax, legal or accounting consultants;
- II. companies that provide the Data Controller with services instrumental to the management of the contractual relationship (e.g. suppliers of management applications, couriers and shippers);
- III. authorities and bodies, public and private, of supervision and control (e.g. Revenue Agency, judicial authorities, etc.).

The data will not be subject to dissemination.

The data subject may request from the Data Controller a list of suppliers and subjects involved in the processing of his or her personal data.

8 – Data retention period

Personal data will be stored for the time necessary to pursue the purposes listed above.

Browsing data will be retained for a period not exceeding 7 (seven) days from the time of their acquisition.

After the retention period the same data will be irreversibly destroyed or anonymized, unless their further storage is necessary to fulfill legal obligations or to comply with orders issued by Public Authorities and/or Supervisory Bodies.

9 - Mandatory or optional nature of providing personal data

In order to navigate in the web app, it is necessary to provide navigation data and data contained in certain cookies (technical cookies). In the case of failure to provide them, an optimal browsing experience on this website may not be guaranteed, resulting in the impossibility of fulfilling the data subject's requests.

The provision of personal data required by the web app procedure is mandatory because without all the requested information, the data subject could not complete the registration procedure for the web app and have access to its services.

10 - Rights of the data subject

By sending a communication to the holder's registered office or to the address privacy@v-registry.com each data subject may at any time exercise the rights set forth in Articles 15 et seq. of the Regulation, including: (i) obtaining confirmation as to whether or not Data concerning him or her is being processed; (ii) obtaining access to his or her Data and to the information indicated in Art. 15 of the Regulations; (iii) obtain the rectification of inaccurate Data concerning him/her without undue delay or the integration of incomplete Data; (iv) request the deletion of Data concerning him/her without undue delay; (v) request the restriction of the processing of Data concerning him/her; (vi) be informed of any rectification or deletion or restriction of processing carried out in relation to Data concerning him/her; (vii) to receive in a structured, commonly used and machine-readable format the Data concerning him/her; (viii) to object at any time, for reasons related to his/her particular situation, to the processing of the Data concerning him/her carried out on the basis of the legitimate interest of the Data Controller.

The exercise of the above-mentioned rights is not subject to any formal constraints and is free of charge. Acknowledgement of the data subject's request is provided within one month of its receipt. In cases of particular complexity, the deadline may be extended; in such cases, the Data Controller undertakes to provide at least one interlocutory communication within one month of receipt of the request.

In the event of exercising any of the rights provided for in the Regulations, the Controller reserves the right to verify the identity of the requesting data subject by requesting that a photocopy of an identity document attesting to the legitimacy of the request be sent. Once the identity of the requesting data subject has been confirmed, the photocopy received will be immediately destroyed.

11 - Complaint to the Regulatory Authority

If the Data Subject considers that the Processing concerning him or her violates the provisions of the Regulations, he or she may always lodge a complaint with the Supervisory Authority of the country in which he or she normally resides, works, or where the alleged violation occurred.