

Privacy Policy – Use of Personal Data

This information is provided in accordance with the European Regulation for the protection of personal data n. 679/2016 (articles 13, paragraph 1) and Legislative Decree no. 196/2003, Code regarding the protection of personal data, in the parts not expressly repealed by Legislative Decree no. 101/2018.

Data controller

The Data Controller is Arseducandi Srl, VAT number 03694390968, headquartered in Milan, CAP 20141, Via Pietrasanta 14, e-mail: info@arseducandi.it, pec: arseducandi@pec.it.

Legal basis for the processing of personal data:

- the performance of pre-contractual measures and/or the contract to which you are a party, with regard to courses;
- sending newsletters and marketing communications with consent.

We remind you that you can always revoke your consent through a special request to the Data Controller at the email: info@arseducandi.it

Information provided

Personal data

In general, all the information you provide us with will be processed, such as:

- personal data: name and surname, tax code, residential address;
- contact details: e-mail address, telephone number.

Purpose of the information collected

The data collected will be used for the following purposes:

1. allow the Ministry of Health to submit a request for recognition of ECM credits;
2. defend our rights.
3. allow us to receive your subscription request;
4. allow us to fulfill the contract (providing the chosen course);
5. allow us to send you newsletters;
6. fulfill our legal obligations;

Nature of the transfer

The provision of some of the personal data is mandatory to request the recognition of ECM credits, so failure to provide such data will not allow you to request and obtain them.

The provision of personal data is optional, however, failure to provide such data will not allow you to conclude the contract and therefore to participate in the chosen course.

Period of time in which personal data will be retained.

The personal data you provide will be kept for the time necessary for the purposes pursued and which has been established. Subject to legal obligations, we undertake to delete your data no later than the following times:

- for enrollment in courses: 5 years;
- for the service of sending the newsletter: 10 years from the day of the request/registration.

Place of processing data

Your personal data is processed at the headquarters of the data controller in Milan, Via Pietrasanta 14.

Methods of processing and storage

The processing of data takes place both in paper form and through the help of electronic or automated tools and is carried out by the Data Controller, as well as by persons authorised by the same within the limits of the task assigned to them, for the time strictly necessary to achieve the purposes for which the data was collected.

The data you provide will be: - processed **lawfully and fairly**; - collected and recorded for **specific, and legitimate purposes**, and used in other processing operations which are compatible with those purposes; - in any case, corresponding to the information provided to us; - **relevant, complete and not exceeding** the purposes for which it is collected or subsequently processed; - kept in a form which allows the person concerned to be identified **for a period of time not exceeding that necessary** for the purposes for which they were collected or subsequently processed.

Specific security measures are observed to minimize the risk of destruction, loss of data, illicit or incorrect use, unauthorized access or processing that is not permitted or does not comply with the purposes for which they were acquired.

Profiling

We inform you that some information provided will be subject to profiling or analysis, in aggregate form, for the sole purpose of allowing us to develop activities tailored to your needs and allowing us to send you targeted and interest-based advertising communications.

Communication of personal data

The personal data provided may only be disclosed to qualified third parties, if appointed data processors, and only if necessary for the performance of the services requested, for the fulfillment of the contract to which you are party or to fulfill legal obligations, with a guarantee of protection of your rights and in compliance with European Regulations and Privacy Codes. We may also need to disclose your data to comply with legal or regulatory requirements. In particular, your data may be communicated to the following categories of subjects: a) Public Administration (Ministry of Health, National Commission for Continuing Education) for the provision of training credits; b) persons, entities or Authorities to whom the communication of your personal data is mandatory by law or regulation (e.g. public security authorities); c) persons, companies or professional firms providing assistance and advice to the Data Controller in accounting, administrative, tax, tax and legal matters; d) data processing companies and IT services; e) persons authorised by the Data Controller who have an adequate legal obligation of confidentiality (e.g. employees and collaborators).

Disclosure of personal data

Your personal data will not be disclosed.

Data transfer abroad

The information provided will not be transferred abroad.

Rights of the interested party

We remind you that you have the right at any time to: a) ask for confirmation that a processing of personal data relating to you is ongoing, and obtain access to such data, in addition to all the information relating to the processing of said data; b) receive a copy of the personal data which is subject to processing; c) rectify inaccurate data or supplement incomplete data; d) request the deletion of personal data concerning you, if

the conditions are met; e) request the restriction of the processing of your personal data, under specific conditions; f) request and receive personal data in a structured and machine-readable format - in cases where the legal basis of the processing is for a contract or consent, and the same is done by automated means -, also in order to communicate such data to another data controller (the right to the portability of personal data); g) object at any time to the processing of personal data in particular situations; h) withdraw consent to the processing of data at any time, limited to cases where the processing is based on consent for one or more specific purposes. The processing carried out prior to the withdrawal of consent, however, is still legal.

Requests should be addressed to the Owner Arseducandi Srl, VAT number 03694390968, with registered headquarters in Milan, CAP 20141, Via Pietrasanta 14, e-mail: info@arseducandi.it, pec: arseducandi@pec.it.

Right of Complaint to the Guarantor Authority

We remind you that you always have the right to lodge a complaint with the Guarantor Authority for the protection of personal data.