

## PRIVACY POLICY

### I - INFORMATION RELATING TO THE SITE'S PRIVACY POLICY

1. This section contains information relating to the management /processing methods of the data of users who access the following sites belonging to the Data Controller and the Joint Data Controller:

<https://hygiene-dental.icomedicine.com/>

2. This information is valid for the purposes of article 13 of EU Regulation no. 2016/679 and the regulations in force on the subject, relating to the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data, for subjects who interact with the Data Controller and with the Joint Data Controllers and is reachable at the address corresponding to the home page of the sites listed above

3. The information is provided only for the site listed above and not for other websites that may be consulted by the user through any links contained therein.

4. The purpose of this document is to provide information on the methods, timing and nature of the information that the data controller must provide to users when connecting to the web pages of the site listed above, regardless of the purpose of the connection itself, according to the current legislation.

5. The information may undergo changes due to the introduction of new regulations in this regard, the user is therefore invited to periodically check this page.

6. If the user is under the age of 14, pursuant to article 8, c.1 of EU regulation 2016/679, he will have to legitimize his consent through the authorization of his parents or guardians.

## II - DATA PROCESSING

### 1 - Data Controller and Joint Data Controller

1. The company that will process your Personal Data for the main purposes indicated in Section III, point 2) of this Information and which, therefore, will play the role of data controller according to the relative definition contained in article 4 at point 7) of the Regulation, *"the natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of processing personal data"* is :

**Malta Icom Educational Ltd. – Triq Misrah il- Barrieri – 122, Santa Venera, SVR 1755 – Malta**

*(hereinafter Data Controller)*

The Data Controller, for some treatments as identified in Section III, point 2) of this Information, will be supported by the company listed below which will act as joint data

controller, meaning "two or more companies that jointly determine the purposes *and the means of processing*" as required by Article 26 of the Regulation:

**CCFO MALTA ICOM SRL , with headquarters in G. Matteotti, 62 in Cinisello Balsamo**

*(hereinafter Data Controller)*

The Joint Data Controllers have entered into a joint data controller agreement, pursuant to Article 26 of the Regulation, with which they undertake to:

- jointly determine certain purposes and methods of processing your Personal Data;
- jointly determine, in a clear and transparent way, the procedures to provide you with a timely response should you wish to exercise your rights, as provided for in articles 15, 16, 17, 18 and 21 of the Regulation as well as in cases of portability of Personal Data envisaged by the article 20 of the Regulation as better described in Section I of this Information;
- jointly define this Information in the parts of common interest indicating all the information required by the Regulation.

## **2 – Responsible for the protection of personal data**

The owner and co-owner of the treatment have appointed the "Data Protection Officer" who is at your disposal for any doubts or clarifications; for this purpose, you can contact him at the address [dpo@icomedicine.com](mailto:dpo@icomedicine.com) . You may request information on the purposes of the processing, on the data retention period, on the possible recipients of your data, etc., as well as for the exercise of your rights provided for in Chapter III of the European Regulation on the protection of personal data .

## **3 - Place of data processing**

- The processing of data generated by the use of <https://igiene-dentale.icomedicine.com/> takes place at **MALTA ICOM EDUCATIONAL LTD. – Triq Misrah il- Barrieri – 122, Santa Venera, SVR 1755 – Malta** and for specific purposes at **CCFO MALTA ICOM SRL , with headquarters in G. Matteotti, 62 in Cinisello Balsamo, VAT number, Fiscal Code 11633140964.**
- In case of need, the data connected to the newsletter service can be processed by the Data Controller, by the Joint Controllers or by subjects appointed by them for this purpose at the relative office.

## **III - DATA PROCESSED**

### **1 - Data processing mode**

1. Like all websites, this site also makes use of log files in which information collected in an automated manner is kept during user visits. The information collected could be the following:

- protocol (IP) address ;
- type of browser and parameters of the device used to connect to the site;
- name of the internet service provider (ISP);
- date and time of visit;
- web page of origin of the visitor ( referral ) and exit; possibly the number of clicks.

2. The aforementioned information is processed in an automated form and collected in an exclusively aggregated form in order to verify the correct functioning of the site, and for security reasons. This information will be treated on the basis of the legitimate interests of the owner.

3. For security purposes (spam filters, firewalls, virus detection), the automatically recorded data may possibly also include personal data such as the IP address , which could be used, in accordance with the laws in force on the subject, in order to block attempts to damage to the site itself or to cause damage to other users, or in any case harmful activities or activities constituting a crime. These data are never used for the identification or profiling of the user, but only for the purpose of protecting the site and its users, such information will be treated on the basis of the legitimate interests of the owner.

4. The site allows the insertion of comments/messages, or in case of specific requests from the user, the site automatically detects and records some user identification data, including the email address. These data are voluntarily provided by the user when completing the request. By inserting a comment or other information, the user expressly accepts the privacy information, and in particular agrees that the contents inserted are freely disclosed to third parties as well. The data received will be used exclusively for the purposes indicated in the following point 2) and only for the time necessary to fulfill them.

5. The information that users of the site deem to make public through the services and tools made available to them, are provided by the user knowingly and voluntarily, exempting this site from any liability regarding any violations of the law. It is up to the user to verify that they have permission to enter personal data of third parties or contents protected by national and international standards.

## **2 - Purpose of data processing**

1. The data collected by the site during its operation are used for the purposes indicated above and for the following purposes:

- *Fulfillment of your requests formulated through the form on the site;*
- *orientation of the most suitable clinical training internship at the affiliated centers closest to your residence;*
- *contact management to set up an interview for you*

- *carrying out the preliminary investigation for the acceptance of the application for admission to the attendance of the university training course*
- *as well as for the fulfillment of legal obligations, regulations and policies, as well as deriving from provisions issued by authorities legitimated by the law and by supervisory and control bodies*

2. Data retention will be carried out for the period strictly necessary to achieve the aforementioned purposes.

3. The data used for security purposes (blocking attempts to damage the site) are kept for the time strictly necessary to achieve the previously indicated purpose.

### **3 - Data provided by the user**

1. As indicated above, the optional, explicit and voluntary sending of e-mails to the addresses indicated on this site involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.

2. Specific summary information will be progressively reported or displayed on the pages of the site set up for particular services on request.

### **4 - COOKIES**

The website [www.diventaigienistadentale.it](http://www.diventaigienistadentale.it) uses cookies to make the user's browsing experience easier and more intuitive: cookies are small strings of text used to memorize some information that may concern the user, his preferences or the access to the Internet (computer, tablet or mobile phone) and are mainly used to adjust the functioning of the site to the user's expectations, offering a more personalized browsing experience and memorizing the choices previously made.

A cookie consists of a small set of data transferred to the user's browser from a web server and can only be read by the server that made the transfer. It is not executable code and does not transmit viruses.

Cookies do not record any personal information and any identifiable data will not be stored. If you wish, you can prevent the saving of some or all cookies. However, in this case the use of the site and the services offered could be compromised. To proceed without changing the options relating to cookies, simply continue browsing.

You can find information on how to manage cookies in your browser at the following addresses:

#### **Google chrome**

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=it>

#### **MozillaFirefox**

<https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>

#### **Apple Safari**

<https://support.apple.com/it-it/guide/safari/sfri11471/mac>

#### **Apple Safari for mobile devices cookies**

<https://support.apple.com/it-it/HT201265>

#### **Microsoft Windows Explorer**

<https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>

### Microsoft Windows Edge

<https://privacy.microsoft.com/it-it/windows-10-microsoft-edge-and-privacy>

Our website can also be used without accepting cookies. If the user does not want his computer to be recognized, he can avoid saving cookies on the hard disk by selecting "Do not accept cookies [Do not accept cookies]" in the browser settings.

More information relating to the cookies used on our site, their purposes, storage times, etc., can be found in the specific section "Cookie policy".

## IV. YOUR RIGHTS

1. The art. 13, ch. 2 of EU Regulation 2016/679 lists the user's rights.

2 The **Data Controller** therefore intends to inform the user about the existence:

- of the right of the interested party to ask the owner for access to personal data (art. 15 EU Regulation), their updating (art. 7, co. 3, letter a) Legislative Decree 196/2003), rectification (art. 16 EU Regulation), the integration (art. 7, co. 3, letter a) Legislative Decree 196/2003) or the limitation of the treatment that concern him (art. 18 EU Regulation) or to oppose, for legitimate reasons, to their treatment (art. 21 EU Regulation), in addition to the right to data portability (art. 20 EU Regulation);
- the right to request cancellation (Article 17 of the EU Regulation), transformation into anonymous form or blocking of data processed in violation of the law, including data whose retention is not necessary in relation to the purposes for which the data was collected or subsequently processed (Article 7, paragraph 3, letter b) Legislative Decree 196/2003);
- the right to obtain the attestation that the operations of updating, rectification, data integration, cancellation, data blocking, transformation have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves the use of means manifestly disproportionate to the protected right (Article 7, paragraph 3, letter C) Legislative Decree 196/2003);

3. Requests can be addressed to the data controller, without formalities or, alternatively, using the model provided by the Guarantor for the Protection of Personal Data, or by sending an email to the address: **info@icomedicine.com**

4. If the treatment is based on the art. 6, paragraph 1, lett. a) – express consent to use – or on art. 9, paragraph 2 lett. a) – express consent to the use of genetic, biometric, health-related data revealing religious or philosophical beliefs or union membership, revealing racial or ethnic origin, political opinions – the user has the right to revoke the consent at any time without prejudice to the lawfulness of the treatment based on the consent given before the revocation.

5. Likewise, in the event of a violation of the law, the user has the right to lodge a complaint with the Guarantor for the Protection of Personal Data, as the authority responsible for monitoring data processing in the Italian State .

6. For a more in-depth examination of your rights, see articles 15 et seq. of EU Regulation 2016/679 and the national harmonization legislative decree .

## **V - DATA TRANSFER TO NON-EU COUNTRIES**

1. This site may share some of the data collected with services located outside the European Union area. In particular with Google, Facebook and Microsoft (LinkedIn) through social plugins and the Google Analytics service. The transfer is authorized and strictly regulated by article 45, paragraph 1 of EU Regulation 2016/679, for which no further consent is required. The companies mentioned above guarantee their adherence to the Privacy Shield.
2. In order to pursue the purposes set out in Section III point 2), your data are archived at the IT infrastructure of the headquarters in Via G. Matteotti, 62 in Cinisello Balsamo (MI).
3. Data will never be transferred to third countries that do not comply with the conditions set out in article 45 and following of the EU Regulation.

## **YOU. SECURITY OF DATA PROVIDED**

1. This site processes user data in a lawful and correct manner, adopting the appropriate security measures aimed at preventing unauthorized access, disclosure, modification or unauthorized destruction of data. The processing is carried out using IT and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated.

2. In addition to the owner, in some cases, categories of persons involved in the organization of the site (administrative, commercial, marketing, legal, system administrators) or external subjects (such as third party technical service providers, couriers) may have access to the data. postal services, hosting providers, IT companies, communication agencies).

## **VII. CHANGES TO THIS DOCUMENT**

1. This document, published at the address:

<https://igiene-dental.icomedicine.com/>

constitutes the privacy policy of the aforementioned sites.

2. It may be subject to changes or updates. Users are invited to periodically consult this page to stay up to date on the latest legislative news.

3. The document was updated on 03/01/2023 to comply with the relevant regulatory provisions, and in particular in compliance with EU Regulation 2016/679.