

PRIVACY POLICY

I - INFORMATION RELATING TO THE SITE'S PRIVACY POLICY

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

www.icomedicine.com

www.icom-fisioterapia.it

www.icomosteopatia.com

www.igiene-dentale.icomedicine.com

www.corsiregionali-icom.it

2. This information is valid for the purposes of article 13 of EU Regulation no. 2016/679 eto the regulations in force on the matter, relating to the protection of natural persons 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 can be reached at the address corresponding to the home page of the sites listed above

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

4. The purpose of this document is to provide information on the methods, times and nature of the information that the data controller and joint data controller must provide to users when connecting to the web pages of the site reported above, regardless of the purposes of the connection itself , according to 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 14 years of age, pursuant to art.8, c.1 EU regulation 2016/679, he/she must legitimize his/her consent through the authorization of his/her parents or legal guardian.

II - DATA PROCESSING

1 - Data Controller and Joint Controller

1. The company that will process your Personal Data for the main purposes reported in Section III, point 2) of this Information and which, therefore, will play the role of data controller according to the relevant definition contained in article 4, point 7) of the Regulation, "the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data" And:

Malta Icom Educational Ltd. - 14 Triq Sir Frederick C. Ponsonby, The Island GZR 1075, 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 that "two or more companies that jointly determine the purposes and means of the processing" as provided for in article 26 of the Regulation:

CCFO MALTA ICOM S.R.L., with headquarters in G. Matteotti, 62 in Cinisello Balsamo

(hereinafter Data Controller)

The Joint Data Controllers have stipulated a joint controllership agreement, pursuant to Article 26 of the Regulation, with which they undertake to:

- jointly determine some purposes and methods of Processing of your Personal Data;
- jointly determine, in a clear and transparent way, the procedures to provide you with timely feedback 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 provided for 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 Data Controller and Joint Data Controller 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@icomosteopatia.it. You may request information on the purposes of the processing, the data retention period, any 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.

4 - Place of data processing

1. The processing of data generated by the use of **www.icomedicine.com** happens at **MALTA ICOM EDUCATIONAL LTD.** - 14 Triq Sir Frederick C. Ponsonby, The Island GZR 1075, Malta and for specific purposes at **CCFO MALTA ICOM S.R.L.**, with headquarters in G. Matteotti, 62 in Cinisello Balsamo, VAT number, Fiscal Code 11633140964.

2. If necessary, the data connected to the newsletter service may be processed by the Data Controller, the Joint Controllers or by subjects appointed by them for this purpose at the relevant office.

III - DATA PROCESSED

1 - Data processing methods

1. Like all websites, this site also uses log files in which information collected automatically during user visits is stored. The information collected could be the following:

- internet protocol (IP) address;
- browser type and device parameters 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 processed based on the legitimate interests of the owner.

3. For security purposes (anti-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 at damage to the site itself or to cause harm to other users, or in any case activities that are harmful or constitute a crime. Such data is never used to identify or profile the user, but only for the purposes of protecting the site and its users, such information will be processed based on 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 identifying data of the user, including the email address. Such data is intended to be voluntarily provided by the user when completing the request. By inserting a comment or other information, the user expressly accepts the privacy policy, and in particular agrees that the contents inserted are freely disseminated to third parties. The data received will be used exclusively for the purposes indicated in point 2) below and only for the time necessary to fulfill them.

5. The information that users of the site decide 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 content protected by national and international regulations.

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:

- ***Processing of your requests formulated using the format on the site;***
- ***orientation of the most suitable training course in the location closest to your residence;***
- ***management of contacts to arrange the cognitive interview,***
- ***carrying out the preliminary investigation for the acceptance of the application for admission to attend 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 legitimized to do so by law and by supervisory and control bodies***

2. Data will be retained for the period strictly necessary to achieve the purposes indicated above. In case of failure to enrol, your data will be deleted before the academic start.

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 electronic mail to the addresses indicated on this site entails 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 - COOKIE

The sites

www.icomedicine.com

www.icom-fisioterapia.it

www.icomosteopatia.com

www.igiene-dentale.icomedicine.com

www.corsiregionali-icom.it

use cookies to make the user's browsing experience easier and more intuitive: cookies are small strings of text used to store some information that may concern the user, his preferences or the Internet access device (computer, tablet or mobile phone) and are mainly used to adapt the

functioning of the site to the user's expectations, offering a more personalized browsing experience and memorizing the choices made previously.

A cookie consists of a small set of data transferred to the user's browser by a web server and can only be read by the server that carried out the transfer. This 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>

Mozilla Firefox

<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-cookie>

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 their computer to be recognized, they can avoid saving cookies on their hard disk by selecting "Do not accept cookies" in their browser settings.

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

5 - Plugin Social Network

1. This site also incorporates plugins and/or buttons for social networks, in order to allow easy sharing of content on your favorite social networks. These plugins are programmed so as not to set any cookies when accessing the page, to safeguard user privacy. Cookies are possibly set, if so provided by social networks, only when the user makes effective and voluntary use of the plugin. Please note that if the user browses while logged into the social

network then he has already consented to the use of cookies conveyed through this site when registering on the social network.

2. The collection and use of information obtained through the plugin are governed by the respective privacy policies of the social networks, to which please refer:

Facebook: <https://www.facebook.com/help/cookies>

Linkedin: <https://www.linkedin.com/legal/cookie-policy>

Instagram: <https://help.instagram.com/>

https://www.youtube.com/intl/ALL_it/howyoutubeworks/our-commitments/protecting-user-data/

IV. USER RIGHTS

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

2 The Data Controller and the Joint Data Controller therefore intend 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 processing that concerns him (art. 18 EU Regulation) or to oppose , for legitimate reasons, to their processing (art. 21 EU Regulation), in addition to the right to data portability (art. 20 EU Regulation);
- of the right to request cancellation (art. 17 EU Regulation), transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed (art. 7, co. 3, letter b) Legislative Decree 196/2003);
- of the right to obtain certification that the updating, rectification, data integration, cancellation, data blocking and transformation operations have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or widespread, except in the case in which such fulfillment proves impossible or involves the use of means manifestly disproportionate to the protected right (art. 7, co. 3, letter C) Legislative Decree. 196/2003);

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

4. If the processing is based on art. 6, paragraph 1, letter. a) – express consent to use – or on the art. 9, paragraph 2 letter. a) – express consent to the use of genetic, biometric, health-related data, which reveal religious or philosophical beliefs or trade union membership, which reveal racial or ethnic origin, political opinions – the user has the right to

withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation.

5. Likewise, in case of 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 processing in the Italian State.

6. For a more in-depth examination of the rights you are entitled to, see the 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 reported in Section III point 2), your data are archived at the IT infrastructure of the headquarters of 14 Triq Sir Frederick C. Ponsonby, Il-Gżira GZR 1075, Malta and shared, for the pursuit of the specific purposes archived, at the IT infrastructure of the Joint Controller's 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 et seq. of the EU Regulation.

YOU. SECURITY OF DATA PROVIDED

1. This site processes user data in a lawful and correct manner, adopting 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 in charge 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:

www.icomedicine.com

www.icom-fisioterapia.it

www.icomosteopatia.com

www.igiene-dentale.icomedicine.com

www.corsiregionali-icom.it

constitutes the privacy policy of the sites mentioned above.

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

3. The document was updated on 01/10/2024 to comply with the relevant regulatory provisions, and in particular in compliance with EU Regulation 2016/679.