

## **Evocare s.r.l. privacy statement**

Evocare s.r.l., Taxpayer ID and Milan Business Register registration number 09638290966 REA number no. 2103522, having registered office in Corso Magenta 56, Milan. ("**Evocare**" or the "**Company**") undertakes to respect Your Privacy. Your personal data is in fact treated in accordance with the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality and accountability, as well as in compliance with all the other conditions set by the EU Regulation no. 2016/679, adopted by the European Parliament and the Council on 27 April 2016.

This document (hereinafter "**Privacy Statement**") has the main purpose of describing Evocare's policy regarding the management of personal information (hereinafter "**Personal Data**"), collected from the MyTravelCare App (hereinafter "**Application**").

### **1. Registration**

As far as this is reasonably possible and compatible with the products and services offered by Evocare, the User may access them anonymously. It will not be necessary to register or create an account within the Evocare server login.

The User may create a profile that will be saved locally only on their device.

However, some of the services offered may store some of the User's personal information (illnesses, age, medicines and treatments, etc.) and, in accordance with this Privacy Policy, Evocare collects such sensitive data only with your express consent.

If anonymity is not compatible with the actual possibility for the App to provide supplying all the services and therefore it is necessary to request different and more in-depth and sensitive personal information, Evocare shall in any case request your express consent before obtaining such information.

### **2. Personal Data collected by the Application**

The Data Controller collects the following types of Personal Data:

#### **A) Data and contents acquired automatically when the Application is used:**

- **Technical Data:** The computer systems and software procedures used to operate the Application may require acquisition, during normal operation, of some Personal Data, whose transmission is implicit in and required by the use of Internet communication protocols. Information are not collected for the purpose of associating it to any identified User. However, due to their nature, these information might, if further processed and correlated with other data held by third parties, be used to identify users. This category of data includes the IP addresses and/or domain names of the site users/visitor's computers, URI (Uniform Resource Identifiers) of requested resources, the

time of request, the method used to submit the request to the server, the size of the file sent as a reply and so on.

#### **B) Personal Data collected via cookies or similar technologies:**

We do not use cookies to transmit personal information, nor do we use any persistent cookies of any kind, or systems that can backtrack Users. In other words the App does not acquire Personal Data through these technologies.

The use of session cookies (which are not permanently stored on the User's device and disappear when the browser is closed) is strictly limited to transmitting session identifiers to allow safe and efficient navigation of the App.

The session cookies used on this App do not use other technologies that could compromise the privacy of Users' browsing and do not allow acquisition of Personal Data that can identify the User.

When you download and install our Application on your mobile device, we assign a random Application installation code to it. This code cannot be used to identify you personally as a User and we cannot identify you personally unless you choose to become one of the registered users of the App.

#### **Type of personal information collected and stored**

The personal information that Evocare can store include:

- a. information relating to the user, such as the User's age and sex
- b. location, position and/or geolocation information
- c. information regarding medical treatments the user has undergone, diseases, allergies, surgeries, symptoms, drugs and the history of the drugs taken;
- d. information on the device used (for example *hardware* model, operating system, preferred language, device's unique ID and mobile network)
- e. Evocare can also collect and store information such as accessing IP, access data and times, the type of *browser* used and the pages found.

### **3. Purposes**

Evocare collects information on the diseases that characterize a specific region/province/city, on the most used type of drug and any other information connected with the User's health state and with the treatment of the various diseases in certain areas or on the type of patients, for statistical purposes. The information provided by Users will not be used in any other way than the one indicated in this Notice.

Evocare may also use the information for the following purposes:

- To satisfy the request and provide the User with the references, in the place where the User is, of health and pharmaceutical services, facilitating the User also in the translation of the terminology useful for access to the

aforementioned services as well as to the drugs summary sheet of the patient;

- For any other purpose directly connected to the service offered by Evocare and for which the User has given consent.
- To record statistical data for marketing analysis and to conduct market research
- To provide, improve and create new services

The collection channels through which the Company collects personal information are as follows:

- a. Any Evocare application, *mobile* and *tablet* , including the MyTravelCare App
- b. any other means by which a person provides personal information to Evocare
- c. any other means by which we collect personal information legally

To ensure a concrete alignment with the international legislation and the *best practices*, Evocare reserves the right to review and update this information at any time, without prejudice to the fact that the declarations will in any case be published on the Company's *website*.

For the pursuit of specific purposes, personal information may be shared with *partners* of Evocare and their corporate bodies and other trusted parties in Italy or abroad, including, but not limited to, Europe, United States of America, Australia and United Kingdom. In any case, Evocare will share information only with your express consent.

Failure to consent to the processing of certain personal information will make it impossible for the Company to provide third parties, users and customers with content and information.

However, the Company reserves the right to use or disclose any information, including personal information, if necessary, or to ensure compliance with laws, rules or legal requests or to cooperate in any investigation or enquiry about public security.

#### **4. Processing method**

Evocare collects your personal information only with your express consent, in accordance with the principles and methods described in this Statement.

The processing of Personal Data is carried out through computer and/or electronic tools, with organizational methods and a logic strictly related to the purposes indicated.

In some cases access to personal data will also be provided to subjects involved in the organization of the Controller (for example system administrators and so on.) or third parties (such as IT companies, service providers, hosting providers, etc.). Such individuals, if necessary, may be appointed as Data Processors by the Data Controller, and can be granted

access to Users' Personal Data whenever necessary and will be bound by contract to keep Personal Data confidential.

Evocare uses your Personal Data only for the purposes they are collected, as indicated above, and for the purposes for which they have been collected or as allowed by the laws in force.

Evocare does not disclose the Information collected without the User's consent.

## 5. Problems or requests

If you wish to ask questions relating to this Statement, or submit problems and/or complaints about the practices adopted by Evocare with regard to the collection, use, storage, management and/or disclosure of your personal information, please contact our *Privacy* officer using the contact details listed below:

Address:

Evocare

.....

e-mail:

.....

Please note that the type of request you indicated requires thirty (30) days from receipt for processing and clearing. In the event that you do not receive a satisfactory answer to the question raised within the indicated period of *thirty (30) days, you may submit it to the Data Protection Authority, which is the independent administrative authority responsible for ensuring the protection of 1338privacy* in Italy, or, alternatively, to the relevant supervisory authority in charge in the EU Member State where you are domiciled or work.

## 6. Legal basis of data processing

The processing of Personal Data relating to the User is based on the following legal grounds:

- The consent is given by the User for one or more specific purposes;
- processing is necessary for the performance of a contract with the User and/or in order to carry out pre-contract measures;
- processing is necessary for compliance with a legal obligation to which the Controller is subject;
- processing is necessary for the execution of a task of public interest or connected to the exercise of public powers vested in the data Controller
- processing is necessary in order to protect the vital interests of the Controller or of a third party;

It is in any case always possible to ask the Data Controller to clarify the legal basis of each processing by contacting them **at the following e-mail address .....**

## 7. Location

The Personal Data are processed at the operational headquarters of the Data Controller and in any other place where the parties involved in the processing are located.

#### **8. Security measures**

The processing is provided in a manner and with appropriate tools to guarantee the security and confidentiality of Personal Data because the Data Controller has adopted appropriate technical and organizational measures that make it possible to prove that the Processing has been carried out in compliance with the applicable laws.

#### **9. Data storage time**

The Personal Data will be stored only for the time necessary to fulfil the purposes for which they were collected and to provide the services.

In the event that the processing of personal data is based on the consent of the User, the Data Controller can keep the personal data until the withdrawal of consent.

Personal Data may be stored for a longer time if necessary to comply with a legal obligation or by order of a legal authority.

When we no longer need to use your personal data and we no longer have to store it to comply with our legal or regulatory obligations, we will remove them from our systems or we will anonymize it.

#### **10. Automated decision-making processes**

None of the Personal Data collected will be subject to any automated decision-making process, including profiling, which may generate legal effects for the person or which may affect the Data significantly.

#### **11. Rights of the User**

Users can exercise specific rights with reference to Personal Data processed by the Data Controller. In particular, the User has the right to:

- withdraw their consent at any time;
- Object to the processing of any Personal Data;
- Access their own Personal Data;
- Check and ask for rectification;
- Obtain restriction of processing;
- Obtain erasure of one's Personal Data.

In order to exercise their rights reserved, the User can send a request to the Controller using the contact details provided. Requests are processed as soon as possible, in any case within 30 days.

**12. The data controller is** Evocare s.r.l., Taxpayer ID and Milan Business Register registration number 09638290966 REA number no. 2103522, having registered office in Corso Magenta 56, Milan.

#### **13. Changes to this Privacy Statement**

We reserve the right to change or modify this Privacy Statement and/or any of our Services at any time and any changes will become effective

and binding at the time of publication. By continuing to use the Services after this Privacy Statement has been updated, you agree to these changes. We encourage you to periodically review this Privacy Statement. If you do not accept the terms of this Privacy Statement, we ask you to not use the MyTravelCare App.