

Privacy Policy – Meddy Care

ARTT. 13 - 14 GDPR



WHO WE ARE

Tech4Care srl, VAT No. 02690340423, Headquarters: Via G. Marconi 31, 60015 Falconara Marittima (AN) - Italy e-mail info@tech4care.it PEC tech4caresrl@pec.it

Data Protection Officer: dpo@tech4care.it



WHY THIS INFORMATION (Scope)

Pursuant to Regulation (EU) 2016/679 (hereinafter "Regulation"), this page describes the methods of processing personal data during the use of our apps, in relation to the Meddy Care service, regardless of the type of device and operating system used (hereinafter, collectively: "App"), referable to the following web domains:

- meddycare.it
- meddycare.eu

This information does not concern other sites, pages or online services accessible via hypertext links published on the websites but referring to resources external to the Meddy Care domains.



DATA CONTROLLER

"Data Controller" is the subject (natural or legal person) who decides which data he needs and for what purposes.

Tech4Care srl holds the role of Data Controller exclusively for the purposes of operation and implementation of the App as well as in research and statistics.

The professional User is the Data Controller of the personal data acquired through the App and referring to HIS patients.



DATA PROCESSOR

"Data Processor" is the subject (natural or legal person) who processes the data on behalf of the owner and who must be able to provide the guarantees provided for by the GDPR.

Tech4Care srl holds the role of Data Processor for any other purpose related to the use of the App, such as storage, management of backups and replicas.



DATA PROTECTION OFFICER

Sometimes technological evolution does not facilitate the task of protecting the data we process. If you have any doubts, if we keep incorrect or incomplete data or if you think that we have mishandled your personal data, please contact the Data Protection Officer (RPD / DPO) or send a request using the "Exercise of Rights ", downloadable at the address below. Our Data Protection Officer (RPD / DPO) will review your request and contact you to resolve the issue as soon as possible.

The Data Protection Officer (DPO) can be contacted at the e-mail address: dpo@tech4care.it

WHAT WE DO WITH YOUR DATA AND WHT (TYPE OF DATA AND PURPOSES)



Data related to professional users of the App:

TYPE OF DATA	EXEMPLES
<i>Personal data</i>	including Name, Surname, e-mail address; birth data (date, country, province, city); gender; telephone number (landline and mobile); picture profile
<i>Business</i>	fiscal Code; VAT number; residence data (country, province, city, postal code, address, house number);
<i>Telematic traffic (Potentially) sensitive data</i>	Log, call source IP address, transaction log. biometric data such as images, audio and video exclusively as data processors (if uploaded by the user of the App)

PURPOSE OF THE PROCESSING	LEGAL BASIS
<i>Management of contractual relationships</i>	Processing related to the preliminary activities and consequent to the purchase of services (order management, service provision, invoicing and payment management, complaints and / or reports to the support and assistance service, provision of assistance activities, sending of communications with informative content as well as any other type of fulfilment related to contractual obligations)
<i>Defence of rights in court or out of court proceedings</i>	Legitimate interest of the Data Controller, taking into account the balance of the rights of the latter and the interested party.
<i>Information security and fraud prevention</i>	Compliance with legal obligations and pursuit of the legitimate interest of the Data Controller
<i>Promotion activities on Services/Products similar to those purchased, research and statistics.</i>	Legitimate interest of the Data Controller to promote products or services for which the customer may have interests. However, the customer has the right to object at any time.



Patients data:

TYPE OF DATA	EXAMPLES
<i>Personal data</i>	including Name, Surname, e-mail address; birth data (date, country, province, city); gender; telephone number (landline and mobile); social security number; residence data (country, province, city, postal code, address, house number)
<i>Telematic traffic (Potentially) sensitive data</i>	Log, call source IP address, transaction log. biometric data such as images, audio and video; visit bookings; visit date; visit report; text and attachments chat with professional; prescriptions required.
PURPOSE OF THE PROCESSING	LEGAL BASIS
<i>Database creation, booking management, communication between patient and professional, platform operation</i>	<p>Tech4Care does not directly collect patient data but undertakes to provide the information pursuant to art. 14 GDPR for the acquisition of data collected directly by the Data Controller. In compliance with the terms and conditions of the service, patient data will be entered manually by the User (professional) in the apps only on the basis of an appropriate legal basis. The legal bases for the processing of personal data are:</p> <ul style="list-style-type: none"> with regard to personal data the purpose of fulfilling the contract pursuant to Art. 6 (1) b) GDPR, alternatively, the data subject's consent, pursuant to Art. 6 (1) a) GDPR, alternatively, the data controller undertakes to process personal data to the extent that this is necessary to comply with a legal obligation pursuant to Art. 6 (1) c) GDPR or to safeguard Tech4Care's legitimate interests, such as the purpose of scientific and/or statistical research, and does not exceed the interests, fundamental rights and fundamental freedoms of the data subject, pursuant to art. Art. 6 (1) f) GDPR. Further, with reference to the processing of personal data of a special category: the explicit consent of the data subject of the processing pursuant to art. 9 (2) a) GDPR; the exercise of health activity and therefore the purpose of treatment and diagnosis pursuant to art. 9 (2) h), art. 9 (3) GDPR and art. 2 sexies u) D.lgs. 196/2003. In addition, the User is obliged to prior inform the data subjects of the processing in accordance with art. 13-14 GDPR. The aforementioned data may also be processed in anonymized form, aggregated or otherwise pseudonymized for the purposes of scientific research and/ or statistics pursuant to art. 9 (2) (j).
<i>Information security and fraud prevention</i>	Compliance with legal obligations and pursuit of the legitimate interest of the Data Controller



WHERE YOUR DATA ENDS (COMMUNICATION TO THIRD PARTIES, RECIPIENTS)

In some cases your personal data may be disclosed to companies that carry out activities on our behalf, instructed to process the data in maximum security and in any case appointed Managers/ Sub Managers, among which we can include the cloud provider (Microsoft Azure, Netherlands).

Pursuant to art. 28 GDPR, Tech4Care and the Professional, as data controllers, use only data processors with sufficient guarantees to implement appropriate technical and organisational measures in such a way that the processing meets the requirements of the Regulation and guarantees the protection of the data subject's rights.

The data controller, as of now, pursuant to art. 28 (2) GDPR authorizes Tech4Care to appoint any sub-processors as recipients of data for the provision of the service, within the limits of this policy.

The categories of persons who may come into contact with the data collected through the use of the App and for whom the respective Data Processing Agreement has been concluded, directly or indirectly, belong to the following categories: consultants and managers of coordination and maintenance services, providers of technical development services, platforms for storing data in the cloud.

For an exhaustive list of the recipients involved, please send your request to: tech4caresrl@pec.it
The personal data collected are also processed by the staff of the Data Controller, who acts on the basis of specific instructions provided for the purposes and methods of the processing itself. Personnel employed in processing activities shall be subject to a specific NDA.

Under no circumstances it is planned to transfer to third countries not belonging to the European Union or not subject to the general principles of the GDPR. Your data will be protected by appropriate safeguards and security measures.



HOW AND BY WHAT MEANS WE PROCESS YOUR DATA

We process your personal data in our offices, also in paper format, and at our cloud provider in digital format. We take all necessary technical and organisational measures to avoid problems of unauthorised access, disclosure, modification or destruction. For the management of the App we use cloud providers with datacenters located in the European Union. Only personnel authorised by Tech4Care are allowed to access the systems for processing or maintenance. No automatic decision systems are used, including profiling.



SECURITY MEASURES

We undertake to protect the personal data processed and to take appropriate technical and organizational security measures to protect them from any unauthorized or illegal processing and from accidental loss, destruction or damage. These security measures are constantly updated in accordance with the latest technological developments.



HOW LONG WE KEEP YOUR DATA

National rules on storage provide that your personal data continue to be stored for as long as necessary for the pursuit of the purposes set out above, unless the Law provides for a longer storage period. In the cases foreseen, after this period, Tech4Care will provide for their destruction.



FROM WHOM WE RECEIVE YOUR DATA (DATA SOURCE)

personal data subject to the processing activities by the Data Controller can be acquired by the professional and the patient through the App as regards the contents, or through commercial channels as regards the business data of the professional. If necessary for the purpose of the relationship with the interested party, we request to other public bodies or carry out research in public registers and/or databases.



WHAT YOUR RIGHTS ARE (ARTT. 15-22 GDPR)

You can directly request the Data Controller to view, correct, delete or limit the data we process and concern you. In some cases, you can also oppose or withdraw your consent to the processing; if technically possible, you also have the right to data portability and therefore at any time you can request a digital copy of the same. You may also apply for the right to be forgotten, but only for the processing for which we have requested your consent.



HOW YOU CAN EXERCISE YOUR RIGHTS

You have the right to lodge a complaint with the Personal Data Protection Authority; further information is available at the web address: <https://www.garanteprivacy.it>



UPDATES

The Information Notice is the tool provided by the Regulation to apply the principle of transparency and facilitate the management of the information that we process and that concerns you. As the processing methods, national or European legislation change, the information may be revised and integrated; in the event of major changes, notice will be given on the website and a new dissemination will be made.

If you have any doubts about the privacy deriving from this policy or about how the owner manages your personal data, please contact us at the following e-mail address: tech4caresrl@pec.it



USE OF COOKIES

In our app we only use so-called "technical cookies", which allow us to recognize the user during the login phase. These data are not passed on to third parties.



NEWSLETTER

In case of collection of your e-mail address, it could be used for sending newsletters via e-mail for our offers similar to the services already purchased, provided that you have not opposed the receipt of such newsletters. By way of example, these newsletters may include updates to new product features, additional services or events where product demonstrations will be held.

You can object to receiving newsletters from us at any time, at no additional cost. You will also be informed of your right to object to the processing at the time of collection of the e-mail address and in the respective newsletter.

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