DATA PRIVACY NOTICE

Extract of article 13 of the EU Regulation 2016/679 (hereby "GDPR")

We inform you that ClinOpsHub S.r.l. (hereinafter also "ClinOpsHub", "the Data Controller" or "the Company") as the Data Controller will treat - for the purposes and methods listed below - your personal data provided when registering for the e-learning platform Pharma Training Hub and the related paid course chosen by you, by filling in the respective forms on the institutional portal.

In particular, ClinOpsHub will treat the following personal data:

a. Personal data (name and surname);
b. Accounting data (billing data: Country, address, city, postal code, Personal Tax Identification Number);
c. Contact details (e-mail address, and phone number).

1. Legal Basis and Purpose of Processing

The processing of your personal data is necessary for the performance of a contract to which you are a party or for the implementation of pre-contractual measures taken at your request (Article 6(1)(b) of the GDPR). Specifically, this processing is based on your request to purchase and access the selected course. The purpose of the processing is to deliver the requested service and to manage the contractual relationship and associated administrative, accounting, and tax obligations.

2. Methods of Processing

The treatment of your personal data is carried out, by means of paper and/or is automated through the use of technological solutions that allow the user to participate directly in the online training events provided by the program, by means of the operations indicated in art. 4 n. 2) of the GDPR and precisely: the treatment of personal data may consist in the collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of provision, comparison or interconnection, limitation, deletion, destruction of data.

3. Data Provision

The provision of the above data for the purposes referred to in point 1 is mandatory. Any refusal will make it impossible for you to enroll in the course you have chosen and therefore to receive the requested service.

4. Scope of data communication

4.1. The data collected may be made accessible/treated for the purposes mentioned above, to personnel who have been expressly authorized to process it, pursuant to art. 2-quaterdecies paragraph 2 of Legislative Decree. 196/2003 as amended by Legislative Decree. 101/2018, to the extent strictly necessary for the performance of managerial and transversal skills.
4.2. Third parties, duly appointed Data Processors pursuant to art. 28 of the GDPR, which were entrusted with the provision of services instrumental to the pursuit of the above purposes.
4.3. The data provided may be disclosed to third parties only if necessary for the fulfilment of legal or contractual obligations or for the fulfilment of institutional purposes (for example: Ministry of Finance, Revenue Agency, Ministries and Competent Authorities, Regions, Provinces, Municipalities, Regional and Provincial Tax Commissions, Control Bodies, Law Enforcement or Judiciary bodies, etc.) who will treat it as independent data controllers for institutional and/or legal purposes during investigations and controls.

5. Data Retention

5.1. Your personal data will be retained only as long as necessary to manage your registration and course

participation, and in any case no longer than 10 years, in compliance with applicable accounting regulations.

5.2. The relevance and necessity of the stored data will be reviewed periodically to ensure it is still required for the stated purposes.

6. Data Transfer

Some of your personal data may be transferred to recipients located outside the European Economic Area (EEA). The Data Controller ensures that such transfers comply with the GDPR, based on either an adequacy decision by the European Commission or the use of Standard Contractual Clauses. For further information on data transfers and the specific processing operations involved, you may contact the Data Controller.

7. Data controller

ClinOpsHub S.r.l., Via Manfredi Svevo 30/B, 72023, Mesagne (BR)
Certified email (CEM): clinopshub@pec.it

8. Data Protection Officer

The Data Controller has appointed a Data Protection Officer (DPO) pursuant to Article 37 of Regulation (EU) 2016/679. The DPO can be contacted at the email address dpo@clinopshub.com for any matters relating to the processing of personal data and the exercise of rights under the GDPR.

9. Rights of the data subject

You may, at any time, request information about the personal data we hold about you, how it was collected, and verify its accuracy, completeness, and relevance. You may request the correction or deletion of your data pursuant to Articles 16 and 17 of the GDPR.

Under Article 21 of the GDPR, you also have the right to object – in whole or in part – to the processing of your data for reasons related to your particular situation. If your data is processed for direct marketing purposes, you may object at any time to such processing.

These rights may be exercised by sending a written request to the Data Controller via registered mail or certified email (PEC). You may also use the model form provided by the Data Protection Authority, available at: https://www.garanteprivacy.it/web/garante-privacy-en/home_en.

Finally, you have the right to lodge a complaint with the Data Protection Authority.