PRIVACY NOTICE

pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter the "GDPR")

Dear,

We hereby inform you that ClinOpsHub S.r.l. (hereinafter also "ClinOpsHub", the "Controller" or the "Company"), acting as Data Controller, will process your personal data for the purposes and in the manner set out below.

1. Purposes and legal bases of the processing

Your personal data are processed for the following purposes, on the basis of the respective legal bases indicated:

1.1 Purpose: provision of the requested consultancy. Your personal data and, specifically, your identification and contact details (first name, last name, e-mail address, telephone number) and data relating to your professional activity are used to handle the consultancy request you have submitted, to contact you, to arrange or confirm the appointment, to carry out the consultancy by telephone or online, and to provide you with the information requested about our courses, services or training programmes. The consultancy may take place by telephone, Google Meet, Microsoft Teams or other online platforms indicated by the Company or agreed with the user.

Legal basis: (Art. 6(1)(b) GDPR).

1.2 Purpose: promotion of new training products (direct marketing) by newsletter. Your personal data and, specifically, your identification data (first name and last name) and your contact details (e-mail address) are used to send newsletters concerning new courses, services and training programmes promoted by the Company.

Legal basis: (Art. 6(1)(a) GDPR).

2. Manner of processing

Your personal data are processed using paper-based and/or automated means, by way of the operations set out in Art. 4(2) GDPR, namely: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, comparison, interconnection, restriction, erasure or destruction of data. The processing is carried out by personnel authorised by the Controller and by any suppliers appointed as Data Processors, with the adoption of adequate technical and organisational security measures.

3. Provision of data

The provision of your personal data for the purposes indicated above is mandatory or optional depending on the purpose pursued, as specified below.

For the purpose referred to in point 1.1, provision is mandatory: failure to provide the data will prevent you from receiving the requested consultancy service.

For the purpose referred to in point 1.2, provision is optional: refusal or failure to give consent will in no way affect your ability to receive the consultancy or service you have already requested; you may withdraw your consent at any time by using the dedicated link included in each communication.

4. Scope of data disclosure

The data collected may be made accessible, for the purposes indicated above, to ClinOpsHub's employees and/or collaborators who carry out work activities for the Controller, acting as persons authorised to process data, to the extent strictly necessary for the performance of their respective duties, pursuant to Art. 2-quaterdecies(2) of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018.

The data may also be disclosed to third parties duly appointed as Data Processors pursuant to Art. 28 GDPR, who have been entrusted with the provision of services instrumental to pursuing the purposes indicated above

(for example: video-conferencing service providers (e.g. Google Meet, Microsoft Teams), IT service providers and communication-sending service providers).

The data may finally be disclosed to third parties where necessary for the fulfilment of legal or contractual obligations, or for the performance of institutional purposes (e.g. the Revenue Agency, government bodies, competent Authorities, law enforcement or judicial authorities), which will process the data as autonomous Data Controllers.

5. Data retention

Personal data relating to the purpose referred to in point 1.1 are retained for the time necessary to manage and provide the requested consultancy and, in any event, until the data subject expressly informs the Controller of their wish to no longer receive the service in question. The obsolescence of the data with respect to the purposes of the processing is checked periodically.

Data processed on the basis of consent for the direct marketing/newsletter purpose (point 1.2) are retained until consent is withdrawn and, in any event, for a period not exceeding 24 months from the user's last interaction, save for earlier withdrawal.

6. Data transfer

Some of your personal data may be shared with recipients located outside the European Economic Area, in connection with the technological and video-conferencing services used to provide the consultancy. The Controller ensures that such processing is carried out in compliance with the GDPR, on the basis of European Commission adequacy decisions or Standard Contractual Clauses. Further information is available by contacting the Controller at the addresses indicated in point 7.

7. Data Controller

ClinOpsHub S.r.l.

Registered office: Via Manfredi Svevo, 30/B — 72023 Mesagne (BR), Italy

VAT number: 02405200748 — SDI Code: M5UXCR1

Legal representative: Dr. Stefano Lagravinese, Scientific Director

Certified e-mail (PEC): clinopshub@pec.it

8. Data Protection Officer (DPO)

The Data Controller has appointed a Data Protection Officer (DPO) pursuant to Art. 37 GDPR, who may be contacted at dpo@clinopshub.com for any matter relating to the processing of personal data and the exercise of the rights referred to in the following point.

9. Rights of the data subject

As a data subject, you may at any time request access to your personal data (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR), data portability (Art. 20 GDPR), and may object to the processing in the cases provided for by Art. 21 GDPR. Where the processing is based on consent, you also have the right to withdraw it at any time, without affecting the lawfulness of the processing carried out prior to withdrawal. All requests may be addressed to the Controller by certified e-mail (PEC) or by e-mail to the DPO, at the addresses indicated above.

You also always have the right to lodge a complaint with the competent supervisory Authority (Garante per la Protezione dei Dati Personali — www.garanteprivacy.it), pursuant to Art. 77 GDPR, should you consider that the processing of your personal data infringes applicable law.