

Privacy Policy

The purpose of this document is to inform the natural person (hereinafter “**Data Subject**”) about the processing of his/her personal data (hereinafter “**Personal Data**”) collected by the data controller, My Healthy Skin S.R.L. (brand name "AQT bio"), with registered office in via Mauro Macchi 72, 20124 Milan, Italy, Tax Code/VAT No. IT12468170969, e-mail address angelina.chigrinetc@aqt.bio, (hereinafter “**Data Controller**”), via the application AQT Psoriasis tracker (hereinafter “**Application**”).

Changes and updates will be effective as soon as they are published on the Application. In case of non-acceptance of the changes made to the Privacy Policy, the Data Subject shall stop using this Application and may ask the Data Controller to delete his/her Personal Data.

1. Categories of Personal Data processed

The Data Controller processes the following types of Personal Data voluntarily provided by the Data Subject:

- **Contact Data:** first name, last name, address, e-mail address, phone number, pictures, authentication credentials, any further information sent by the Data Subject, etc.

If the Data Subject decides not to provide Personal Data for which there is a legal or contractual obligation, or if such data is a necessary requirement for the conclusion of the contract with the Data Controller, it will be impossible for the Data Controller to establish or continue any relationship with the Data Subject.

The Data Subject who communicates Personal Data of third parties to the Data Controller is directly and exclusively liable for their origin, collection, processing, communication or divulgation.

2. Cookies and similar technologies

Cookies are not used for the transmission of personal information, and neither are persistent cookies of any kind used, i.e. systems for tracing the Data Subjects. Therefore, the Application does not acquire the Personal Data of the Data Subjects using these technologies. Use is made of session technical cookies (not persistent), strictly limited to what is necessary for the safe and efficient navigation of the Application.

3. Legal basis and purpose of data processing

The processing of Personal Data is necessary:

- a. for the performance of the contract with the Data Subject and especially:
 1. **fulfillment of any obligation arising from the pre-contractual or contractual relationship with the Data Subject**
 2. **registration and authentication of the Data Subject:** to allow the Data Subject to register in the Application, to access it and to be identified in it, also via external platforms
 3. **support and contact with the Data Subject** to answer the Data Subject's requests
- b. for legal obligations and especially:
 1. **the fulfilment of any obligation provided for by the applicable norms**, laws and regulations, in particular, on tax and fiscal matters
- c. for the legitimate interest of the Data Controller, for:
 1. **marketing purposes by e-mail of products and/or services of the Data Controller** to directly sell the Data Controller's products or services using the email provided by the Data Subject in the context of the sale of a product or service similar to the one being sold
 2. **anonymous data based statistics:** in order to carry out statistical analysis on aggregated and anonymous data in order to analyze behaviors of the Data Subject to improve products and/or services provided by the Data Controller and better meet the expectations of the Data Subject
- d. on the basis the Data Subject's consent, for:
 1. **profiling the Data Subject for marketing purposes** to provide the Data Subject with information on the Data Controller's products and/or services through automated processing designed to collect personal information to predict or assess the Data Subject's preferences or behaviors
 2. **marketing purposes of the Data Controller's products and/or services** to send information or commercial and/or promotional materials, to perform direct sales activities of the Data Controller's products and/or services or to conduct market research with automated and traditional methods
 3. **marketing purposes of third-party products and/or services** to send information or commercial and/or promotional materials of third parties, to carry out direct sales activities or to perform market research of their products and/or services with automated and traditional methods

On the basis of the legitimate interest of the Data Controllerowner, the application allows interactions with external web platforms or social networks whose processing of personal data is governed by their respective privacy policies to which please refer. The interactions and information acquired by this Application are in any case subject to the privacy settings that the Data Subject has chosen on such platforms or social networks. Such information - in the absence of specific consent to processing for other

purposes - is used exclusively to allow the use of the Application and to provide the information and services requested.

The Data Subject's Personal Data may also be used by the Data Controller to protect itself in judicial proceedings before the competent courts.

4. Data processing methods and receivers of Personal Data

The processing of Personal Data is performed via paper-based and computer tools with methods of organization and logics strictly related to the specified purposes and through the adoption of appropriate security measures.

Personal Data are processed exclusively by:

- persons authorized by the Data Controller to process Personal Data who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality;
- subjects that operate independently as separate data controllers or by subjects designated as data processors by the Data Controller in order to carry out all the processing activities necessary to pursue the purposes set out in this policy (for example, business partners, consultants, IT companies, service providers, hosting providers);
- subjects or bodies to whom it is mandatory to communicate Personal Data by law or by order of the authorities.

The subjects listed above are required to use appropriate measures and guarantees to protect Personal Data and may only access data necessary to perform their duties.

Personal Data will not be indiscriminately shared in any way.

5. Place

If necessary, Personal Data may be transferred to subjects located outside the territory of the European Economic Area (EEA). Whenever Personal Data is transferred outside the EEA, the Data Controller shall take all appropriate and necessary contractual measures to guarantee an appropriate level of protection for Personal Data, including - but not limited - to agreements based on the standard contractual clauses for the transfer of data outside the EEA, approved by the European Commission. To obtain information on the specific guarantees adopted, the Data Subject may contact the Data Controller at the following e-mail address **angelina.chigrinetc@aqt.bio**

6. Fully automated decision-making processes

The Data Controller uses fully automated decision-making processes that may produce legal effects or have a significant impact on the Data Subject and that operate according to these criteria: skin- and habit-scores calculation is executed by an automated algorithm .

7. Personal Data storage period

Personal Data will be stored for the period of time that is required to fulfill the purposes for which it was collected. In particular:

- for purposes related to the execution of the contract between the Data Controller and the Data Subject, will be stored for the entire duration of the contractual relationship and, after termination, for the ordinary prescription period of 10 years. In the event of legal disputes, for the entire duration of such disputes, until the time limit for appeals has expired
- for purposes related to legitimate interests of the Data Controller, they will be stored until the fulfilment of such interest
- in compliance with legal obligations, by order of an authority and for legal protection, they shall be stored according to the relevant timeframes provided for by such obligations, regulations and, in any case, until the expiry of the prescriptive term provided for by the rules in force
- for purposes based on the consent of the Data Subject, they will be stored until the consent is revoked

At the end of the conservation period, all Personal Data will be deleted or stored in a form that does not allow the identification of the Data Subject.

8. Rights of the Data Subject

Data Subjects may exercise specific rights regarding the Personal Data processed by the Data Controller. In particular, the Data Subject has the right to:

- be informed about the processing of their Personal Data
- withdraw consent at any time
- restrict the processing of his or her Personal Data
- object to the processing of their Personal Data
- access their Personal Data
- verify and request the rectification of their Personal Data
- restrict the processing of their Personal Data

- obtain the erasure of their Personal Data
- transfer their Personal Data to another data controller
- file a complaint with the Personal Data protection supervisory authority and/or take legal action.

In order to use their rights, Data Subjects may send a request to the following e-mail address angelina.chigrinetc@aqt.bio. Requests will be immediately treated by the Data Controller and processed as soon as possible, in any case within 30 days.

Last update: 27/04/2024