

**Privacy Policy updated to comply with the new EU Regulation no. 679/2016 (GDPR) (and subsequent legislative adaptation provisions to Italian Law 196/2003 as per Legislative Decree 101/2018).**

Pursuant to Article 13 of EU Regulation No. 2016/679 (General Data Protection Regulation or "GDPR"), the ROI Association – Registry of Italian Osteopaths hereby informs those ("users" or "interested parties") who access its institutional website at [https://www. https://www.registro-osteopati-italia.com/](https://www.registro-osteopati-italia.com) and who use the services available electronically on the same site, the following information.

This information applies exclusively to the Association's website and not to other websites that may be accessed via links provided or accessible on the portal.

**PREMISE:**

This privacy policy (hereinafter "Privacy Policy") aims to describe the management methods – with regard to the processing of personal data of users/visitors pursuant to the Regulation (hereinafter only "Users") – of the association's website, which is listed below:

[www.registro-osteopati-italia.com](http://www.registro-osteopati-italia.com)

All websites other than those listed above, even those accessed by the User via links and/or banners on the Websites, are not covered by the Privacy Policy.

The data controller, in compliance with privacy legislation and according to the guidelines described in the Privacy Policy, intends to guarantee the protection and security in the processing of personal data of each User of the Websites, which includes cookies, usage data, email addresses, first and last names, telephone numbers, and home/residential addresses.

**In any case, even in the absence of a specific Privacy Policy pursuant to Article 13 of the Regulation, the Privacy Policy will serve as a document providing the information required by Articles 13 and 14 of the Regulation for all Users of the Websites who interact with the Data Controller to use the services offered by those Websites.**

**1. Data controller**

The data controller is ROI – Registro degli Osteopati d'Italia (hereinafter "ROI" or "Data Controller"), with registered office in Via Raffaello Sanzio, 16, at Dr. Carlo Ciardiello, 20149 Milan, Italy. **CF 91015190670, e-mail [segreteria@roi.it](mailto:segreteria@roi.it), tel. 0248199758.**

The Data Controller has not appointed a Data Protection Officer as the conditions set out in Article 37 of the GDPR do not apply.

## 2. Purpose, legal basis, object of the processing, nature of the data provision

### A) With regards to the data processing carried out by this website:

#### Towards website users

	ACTIVITY	PURPOSE OF THE PROCESSING	LEGAL BASIS AND LEGALITY OF THE PROCESSING AND NATURE OF THE PROVISION	TYPE OF DATA PROCESSED	DATA RETENTION TERMS
to	NAVIGATION	1) to allow the use of this website, as well as to carry out the maintenance and technical assistance necessary for its correct functioning;	<p><b>The legal basis</b>The processing referred to in letter a) of this section is based on Article 6, paragraph 1, letter f) of the GDPR, which states: "processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party."</p> <p>The Processing of Your Personal Data will be legally based on the contractual relationship that will be created between you and the Data Controller following your interaction with the specific website of the professional firm;</p>	<p>•<b>navigation data</b>This category of data includes IP addresses or domain names of computers and terminals used by users, URI/URL (Uniform Resource Identifier/Locator) addresses, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), and other parameters relating to the user's operating system and IT environment. This data, necessary for the use of web services, is also processed for the following purposes:</p> <ul style="list-style-type: none"> <li>•obtain statistical information on the use of the services (most visited pages, number of visitors per time slot or day, geographical areas of origin, etc.);</li> <li>•check the correct functioning of the services offered.</li> <li>•<b>data communicated by the user:</b>such as, for example, personal data provided through the "contact" form or data provided in the "Contacts" section.</li> <li>•Cookies and other tracking systems: for details on the cookies used by the data controller's website, please refer to the section on cookies in the data protection information on the data controller's</li> </ul>	Time required to complete the tasks required for the correct functioning of the website

				<p>website. In particular, it is specified that the data processed via the website are:</p> <p><b>Derived data</b> Information our servers automatically collect when you access the Site, such as your IP address, browser type, operating system, access times, and the pages you viewed directly before and after accessing the Site.</p> <p><b>Facebook Permissions</b> The Site may, by default, access basic Facebook account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other public information.</p> <p><b>Data from social networks</b> User information from social networking sites, Facebook, Google+, LinkedIn and other social networks, including your name, social network username, location, gender, date of birth, email address, profile photo and public contact information, if you connect your account to such social networks.</p> <p><b>Third-party data</b> The site does not currently send data to third parties not affiliated with the owner.</p>	
b	<b>RESPONSE BY THE OWNER TO USER REQUESTS</b>	2) allow the Data Controller to respond to requests made by you via this website	<p><b>The legal basis</b>The processing referred to in letter a) of this section is based on Article 6, paragraph 1, letter f) of the GDPR, which states: "processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party." The Processing of Your Personal Data will be legally based on the contractual relationship that will be created between you and the Data Controller following your interaction with the specific website of the professional firm;</p>	<p>•<b>data communicated by the user:</b> such as, for example, personal data provided through the "contact" form or data provided in the "Contacts" section.</p> <p>•<b>Cookies and other tracking systems:</b> for details on the cookies used by the data controller's website, please refer to the section on cookies in the data protection information on the data controller's website.</p> <p>In particular, it is specified that the data processed via the website are:</p> <p><b>Data from social networks</b> User information from social networking sites, Facebook, Google+, LinkedIn and other social networks, including your</p>	Time required to respond to users

				name, social network username, location, gender, date of birth, email address, profile photo and public contact information, if you connect your account to such social networks.	
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**B) With regards to the data processing activity carried out:**

**towards members:**

		PURPOSE	LEGAL BASIS	NATURE OF THE CONTRIBUTION	DATA TYPES	STORAGE TERMS
to	<b>Contract</b>	In order to allow you to join and to follow up on your requests, the Data Controller needs to collect some of your Personal Data, as requested in the subscription form. in particular: 1. for the pursuit of the statutory purposes and in particular for the management of the associative relationship: registration in the members' register, the performance of the activities resulting from the conferral of the position of member of the Board of Directors and other associative bodies;  2. to manage the membership relationship (sending correspondence, calling meetings of the bodies, internal administrative procedures) and to organize and execute the service;  3. to send (via post, email, newsletter, mobile phone number, or other electronic means) communications related to the Association's activities	- Execution of pre-contractual measures taken at the request of the data subject and/or execution of a contract to which the data subject is party (Article 6, paragraph 1, letter b) GDPR).	The provision of data is optional but in case of refusal to provide personal data it will not be possible for the Data Controller to provide the service.	identification and contact details: name, surname, email address, telephone number, tax code  Special data:  a) Personal data, including data relating to your family members, such as, for example: name, surname, gender, tax code, residential address and telephone number, place and date of birth, email address, marital status;  b) Special categories of personal data, including data relating to your family members: that is, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to health or data relating to a person's	For the entire duration of the membership relationship and subsequently for 10 years from the conclusion of the membership relationship.

		<p>and initiatives;</p> <p>4. in relation to the personal photo, for inclusion in the identification card;</p> <p>5. for members' participation in courses, meetings, and initiatives and for the organization and management of the courses;</p> <p>The legal basis for processing is the membership application and the membership contract (Article 6, paragraph 1, letter b, GDPR), consent to processing (Article 6, paragraph 1, letter a, GDPR), regular contact with the Association (Article 9, paragraph 2, letter d, GDPR), and compliance with the Association's legal obligations (Article 6, paragraph 1, letter c, GDPR).</p> <p>6. to carry out all procedures required by current legislation regarding workplace safety, privacy, and the environment;</p> <p>7. for the collection and entry into the computer databases;</p> <p>8. for issuing invoices and credit notes; 9. for maintaining ordinary accounting and VAT; 10. for managing receipts and payments.</p> <p>The legal basis of the purposes referred to in points 1-10 is the stipulation of the association contract between the member and the organisation as the membership application and membership contract (Article 6, paragraph 1,</p>			<p>sex life or sexual orientation;</p> <p>c) Personal data relating to criminal convictions and offenses: i.e., personal data capable of revealing the provisions referred to in Article 3, paragraph 1, letters a) to o) and r) to u), of Presidential Decree no. 313 of 14 November 2002, regarding criminal records, the register of administrative sanctions arising from crimes and related pending charges, or the status of defendant or suspect pursuant to Articles 60 and 61 of the Code of Criminal Procedure.</p>	
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		letter b, GDPR), consent to processing (Article 6, paragraph 1, letter a, GDPR), regular contact with the Association (Article 9, paragraph 2, letter d, GDPR), and legal obligations to which the Association is subject (Article 6, paragraph 1, letter c, GDPR).				
b	<b>Legal obligation</b>	<ul style="list-style-type: none"> <li>- record invoices, receive payments;</li> <li>- fulfill pre-contractual, contractual, and tax obligations arising from the relationship with customers;</li> <li>- fulfill obligations established by law, by a regulation, by community legislation or by an order of the Authority</li> </ul>	<p>- Legal obligation to which the data controller is subject (Article 6, paragraph 1, letter c) GDPR).</p> <p>The provision of data is mandatory, and in case of refusal to provide personal data it will not be possible for the Data Controller to provide the service.</p>	The provision of data is optional but in case of refusal to provide personal data it will not be possible for the Data Controller to provide the service.	identification and contact details:  name, surname, place and date of birth, email address, telephone number	For the entire duration of the membership relationship and subsequently for 10 years from the conclusion of the membership relationship.
c	<b>Defense in court</b>	- exercise the Data Controller's rights, such as the right to legal defense.	- Legitimate interest of the data controller (art. 6, par. 1, letter f) GDPR): right of defense fairly balanced with the same right of the data subjects	The provision of data is optional but in case of refusal to provide personal data it will not be possible for the Data Controller to provide the service.	identification and contact details:  name, surname, place and date of birth, email address, telephone number and data necessary for legal defense	For the entire duration of the membership relationship and subsequently for 10 years from the conclusion of the membership relationship.
d	<b>Marketing</b>	<b>Sending newsletters, commercial communications, and marketing communications: the Data Controller's performance of its own promotional and/or marketing activities for you. This category includes all activities carried out to promote products and services sold and/or provided by the Data Controller, subject to your specific consent.</b>	<b>Legal basis and lawfulness of processing:</b> legitimate interest pursuant to art. 6 letter f) of the Regulation – The Processing of your Personal Data will be conducted by the Data Controller and will be legally based on the legitimate interest of the latter in promoting its products and services; <b>Legal basis and lawfulness of processing: consent of the data subject pursuant to Art. 6(a) of the Regulation –</b>	The provision of data is optional.	identification and contact details:  name, surname, place and date of birth, email address, telephone number	24 months from harvest

			<p><b>The Processing of your Personal Data will be conducted by the Data Controller and will be legally based on your free, express, and unambiguous consent.</b></p>			
And	<p><b>publication and compilation of the list of members</b></p>	<p>For the publication and compilation of the list of members (containing identifying data relating to name, surname, contact details, and location) in a specific electronic register available online on the website: <a href="https://www.registro-osteopati-italia.com">https://www.registro-osteopati-italia.com</a>.</p> <p>The legal basis for the purpose referred to in point 11 is the stipulation of the membership contract with the entity, which in turn has its statutory legal basis in point 2 of the ROI Association's Bylaws, which recognizes information, communication, and transparency as essential to ensuring the participation of members in the Association's life, to ensure the best achievement of its institutional goals. Specifically, the data controller's legitimate interest lies in the purpose of entering the member's contact details and office location in order to enable website users to use the page's functions. <a href="https://www-registro-osteopati-italia.com/mappa-studi/">https://www-registro-osteopati-italia.com/mappa-studi/</a>, also by</p>	<p>The legal basis is the data subject's consent pursuant to Art. 7 GDPR.</p> <p>The legal basis is also the owner's legitimate interest in promoting the Association's activities.</p>	<p>The provision of data is optional but in case of refusal to provide personal data it will not be possible for the Data Controller to provide the service.</p>	<p>identification and contact details:</p> <p>name, surname, place and date of birth, email address, telephone number, image and biometric data</p>	<p>For the entire duration of the membership relationship and subsequently for 10 years from the conclusion of the membership relationship.</p>

		accessing it from the Home page by selecting the "search for an osteopath" option.				
f	images/videos	in relation to images/videos, for publication on the Association's website, on the Association's social networks, in newsletters, or on printed materials promoting the Association's institutional activities, subject to your explicit consent.	<p><b>legal basis and lawfulness of the processing:</b> legitimate interest pursuant to art. 6 letter f) of the Regulation – The Processing of your Personal Data will be conducted by the Data Controller and will be legally based on the legitimate interest of the latter in promoting its services;</p> <p><b>Legal basis and lawfulness of processing: consent of the data subject pursuant to Art. 6(a) of the Regulation – The Processing of your Personal Data will be conducted by the Data Controller and will be legally based on your free, express, and unambiguous consent.</b></p>	The provision of data is optional.	Biometric data, audio or video and images	In order to enhance the training content and allow its reuse for future initiatives (including the creation of on-demand content, training repertoires or promotional material), the video/audio recording of the webinar and the related teaching material will be retained for a maximum period of 20 years from the date of the event.
g	statistical analysis	for carrying out statistical analyses, even in aggregate and anonymous form.	<p>The legal basis is the data subject's consent pursuant to Art. 7 GDPR.</p> <p>The legal basis is also the owner's legitimate interest in the Association's statistical analysis activity.</p>	The provision of data is optional but in case of refusal to provide personal data it will not be possible for the Data Controller to provide the service.	Anonymized data of various nature	Duration of the contractual relationship and 5 years thereafter or until consent is revoked
h	Use of Copilot AI and other supporting AI, including general AI	<b>Using Copilot Artificial Intelligence</b> because it is integrated into the Microsoft 365 system and other artificial intelligences used by staff to support operations	Users are informed in light of the combined provisions of privacy legislation and Legislative Decree 132/2025. Legal basis: legitimate interest (Article 6, paragraph 1, letter f, GDPR)	The provision of data is optional but in case of refusal to provide personal data it will not be possible for the Data Controller to provide the service.	The nature of the provision is optional but failure to provide the data will make it impossible for the Data Controller to provide the service.	Duration of the contractual relationship and 5 years thereafter or until consent is revoked

the	<b>WhatsApp Communications</b>	receiving communications from the association via WhatsApp as well as the possibility of being included in WhatsApp groups	Consent of the interested party (Article 6, paragraph 1, letter a, GDPR)	The nature of the provision is optional but failure to provide the data will make it impossible for the Data Controller to provide the service.	Identification and contact data: name, surname, telephone number	Until specific consent is revoked
j	<b>Webinars and web meetings</b>	Managing online meetings and webinars via Zoom	Consent of the interested party (Article 6, paragraph 1, letter a, GDPR)	The nature of the provision is optional but failure to provide the data will make it impossible for the Data Controller to provide the service.	Contact details (email, surname, name)	In order to enhance the training content and allow its reuse for future initiatives (including the creation of on-demand content, training repertoires or promotional material), the video/audio recording of the webinar and the related teaching material will be retained for a maximum period of 20 years from the date of the event.

### Towards employees and collaborators

The processing of personal data, including sensitive data pursuant to and for the purposes of Article 9 of the GDPR, including that of third parties, provided upon the signing of an employment contract is carried out in accordance with the contract itself and/or the relevant collective bargaining agreement, as well as in compliance with legal obligations.

Refusal to provide all or some of the requested data and/or the provision of partial and/or inaccurate data by interested parties prevents the Data Controller from fulfilling its legal and contractual obligations, particularly welfare and social security obligations, including those related to requests for family allowances. Specifically, the purposes are:

fulfill obligations arising from the employment contract (for example, to verify the exact fulfillment of the service, to assess the amount of remuneration, including for overtime, or bonuses to be paid, to ascertain the existence of a legitimate reason for absence, to request family allowances, to quantify holidays and permits);

purposes envisaged by the sector collective bargaining agreement (for example, to benefit from union permits or leaves of absence);

purposes required by law: for communications and delegations to social security and welfare institutions, both public and private;

to fulfill accounting obligations (e.g. legally required records and registers) imposed on the employer;

carry out security checks on the Data Controller's IT systems, in order to prevent unauthorized access or unauthorized communications and to protect the Data Controller's corporate assets;

fulfill obligations established by law, by a regulation, by community legislation or by an order of the Authority;

exercise the Data Controller's rights, for example the right to defense in court.

The legal basis for processing data for the purposes indicated above is the performance of a contract to which the data subject is party (Article 6, paragraph 1, letter b) of the GDPR), the Data Controller's fulfillment of legal obligations (Article 6, paragraph 1, letter c) of the GDPR), and the Data Controller's legitimate interest (Article 6, paragraph 1, letter f) of the GDPR), which is fairly balanced with the rights and freedoms of the data subjects.

The processing of sensitive data revealing the data subject's health is necessary to fulfill the obligations and exercise the specific rights of the data controller or the data subject in the field of labor and safety law (Article 9, No. 2, Letter b) of the GDPR), as well as for occupational medicine purposes (Article 9, No. 2, Letter h) of the GDPR).

The provision of personal data is mandatory, as it is required to fulfill legal and contractual obligations.

Failure to provide personal data will make it impossible for the Data Controller to establish and/or continue an employment or collaboration relationship with the interested party.

The purposes for which the company's staff's email metadata is stored are:

compliance with the consumer code towards customers, i.e. allowing customer requests to be fulfilled in compliance with the provisions of Legislative Decree no. 206 of 6 September 2005 and subsequent amendments and Law no. 214 of 30/12/2023;

- security of IT systems and assets
- fulfillment of legal obligations and industry regulations;
- defense in court.
- verification of the correct use of company resources and prevention of abuse or contractual violations
- ensure the correct functioning of e-mail
- verification of the correct use of company resources and prevention of abuse or contractual violations

The legal basis for data processing in this case is:

- the legitimate interest of the data controller: in compliance with European and national regulations, **in order to** ensure IT security, and to verify the proper functioning of company operations and violations of company policy.

## Towards the candidates

to)	Staff selection	<p><u>purposes related to the execution of pre-contractual negotiations:</u> Management of the selection and evaluation process of candidates for inclusion in the company organization, including the evaluation of candidates for the positions sought; The Data Controller may process sensitive data pursuant to Art. 9 GDPR, such as, but not limited to: health status, membership in protected categories, disability, or trade union membership, etc.</p>	<p>The legal basis for processing data for the purposes specified above is the performance of pre-contractual negotiations requested by the data subject (Article 6(1)(b) of the GDPR). When evaluating applications, the Data Controller may also process sensitive personal data pursuant to Article 9 of the GDPR, such as, but not limited to, data revealing health, religious beliefs, or trade union membership.</p> <p><u>The legal basis</u> In this case, the data subject's free, specific, and informed consent is the basis for processing (Article 6(1)(a) of the GDPR). Failure to provide consent will prevent the application from being evaluated.</p> <p>The data subject has the right to withdraw their consent at any time, but any processing carried out before the withdrawal remains lawful. After the withdrawal, the data controller will cease processing the data for which consent is required (Article 7, paragraph 3, GDPR).</p>	<p>Curriculum vitae and the data contained therein: Contact information (such as address, email address, telephone number, etc.); Data relating to education, professional experience and previous activities; Special categories of personal data (such as, for example, health status, trade union membership, etc.) only to the extent that such information is contained in the CV Photo as present on the CV Processing is carried out both manually and electronically, with the support of paper-based, IT-based (management and accounting software, etc.), or otherwise automated and telematic means.</p> <p>In any case, data processing is carried out by adopting all appropriate measures to ensure the security and confidentiality of personal data, in particular in compliance with the security measures set forth in Article 32 of European Regulation No. 2016/679 and in accordance with the principles of lawfulness, necessity, and proportionality.</p>
b	Legal obligation	fulfill the obligations established by law, with reference to any subsequent hiring.	The legal basis that legitimises the processing of data for the purposes specified above is the fulfillment of legal obligations (Article 6,	Contact information (such as address, email address, telephone number, etc.); Data relating to education,

			paragraph 1, letter c) of the GDPR).	professional experience and previous activities;
c	Defense in court	protection of the owner's rights and exercise of the right of defense in the event of disputes	The legal basis for processing data for the purposes specified above is the Data Controller's legitimate interest (Article 6(1)(f) of the GDPR), which in this case is fairly balanced with the rights and freedoms of the data subjects.	Contact information (such as address, email address, telephone number, etc.); Data relating to education, professional experience and previous activities; and data necessary for legal defense.

### 3. DATA PROCESSING METHODS AND DATA COLLECTION METHODS

Your personal data is processed through the following operations: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of data.

The processing will be carried out using manual and/or computerized and electronic tools, with organizational and processing logic strictly related to the purposes themselves and in any case in a manner that guarantees the security, integrity, and confidentiality of the data in compliance with the organizational, physical, and logical measures set forth in Articles 24, 25, and 32 of the GDPR.

The personal data being processed is collected directly by the Data Controller or by third parties expressly authorized by the latter, or communicated by the Data Controller to such third parties for the purposes set out in this policy.

The Data Controller periodically carries out checks to ensure that no personal data is processed, collected, archived, or retained that is not necessary for the processing and related purposes as indicated in this policy.

### 4. ACCESS TO DATA BY COLLABORATORS IN CHARGE OF PROCESSING

Your data may be made accessible for the exclusive purposes set out in this policy:

- to employees and collaborators of the Data Controller, assistants and third-party employees of supply companies and companies in outsourcing relationships with the Data Controller in their capacity as persons authorised to process data and/or internal data processors and/or system administrators;
- to third-party companies or other entities that carry out outsourcing activities on behalf of the Data Controller, in their capacity as external data processors.

### 5. COMMUNICATION OF PERSONAL DATA

Personal Data may be disclosed to specific entities considered recipients of such Personal Data, meaning natural or legal persons, public authorities, agencies, or other bodies to which personal data are disclosed, whether or not they are third parties.

From this perspective, in order to correctly carry out all the Processing activities necessary to pursue the purposes set out in this Policy, the following Recipients may be required to process your Personal Data:

Third parties who perform part of the Processing activities and/or related and instrumental activities on behalf of the Data Controller. These parties have been appointed as data processors, meaning natural or legal persons,

public authorities, agencies, or other organizations that process Personal Data on behalf of the Data Controller; individuals, employees, and/or collaborators of the Data Controller who have been entrusted with specific and/or multiple Processing activities involving your Personal Data. These individuals have been given specific instructions regarding the security and proper use of Personal Data and are defined as "persons authorized to process Personal Data under the direct authority of the Data Controller or the Data Processor."

Where required by law or to prevent or suppress the commission of a crime, your Personal Data may be disclosed to public bodies or judicial authorities, without these being defined as Recipients. The Regulation establishes that public authorities receiving Personal Data in the context of a specific investigation conducted in accordance with Union or Member State law are not considered Recipients.

Without the need for express consent, the Data Controller may communicate your data for the aforementioned purposes to supervisory bodies, judicial authorities, insurance companies for the provision of insurance services, as well as to those parties to whom communication is required by law for the fulfillment of the aforementioned purposes.

In particular, the recipients of the data may be:

- information and computer assistance society;
- companies or professional firms that offer professional and/or consultancy services relating to accounting, legal, tax, administrative, financial, and debt collection matters;
- IT infrastructure and solutions providers;
- web service providers;
- banks and payment service providers, acting as Data Processors, to whom your personal data may be disclosed for the purposes of processing your payments;
- consultants, to the extent necessary for the performance of their professional duties.

The communication concerns the categories of personal data whose transmission to the third parties mentioned above is necessary for the performance of the activities and for the purposes set out in this disclosure.

The updated list of Data Processors and authorized data processors is kept at the Data Controller's headquarters and is available upon request by email to the address indicated in point 1 of this data protection notice.

Some of these entities may process the data in their capacity as independent data controllers.

Your data will not be disclosed.

Data communications may also relate to:

### **Law or exercise of rights**

If we believe disclosure of information is necessary to respond to legal proceedings, investigate or address potential violations of our policies, or protect the rights, property, and safety of others, we may share information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

### **Third-party service providers**

The site does not share information with third parties who perform services for the site or on our behalf, including data analysis, email sending, hosting services, customer service, and marketing assistance. (cookie list)

### **Cookies and web beacons**

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site to help personalize the Site and improve your experience. When you access the Site, no personal information is collected

through the use of tracking technologies. Most browsers are set to accept cookies by default. You can remove or reject cookies, but please be aware that doing so may affect the availability and functionality of the Site. You cannot reject web beacons. However, they can be disabled by rejecting all cookies or by adjusting your browser settings to notify you each time a cookie is offered, allowing you to accept or reject cookies on an individual basis. We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site to help personalize the Site and improve your browsing experience.

## 6. THIRD PARTY WEBSITES

The site does not contain links to third-party websites and applications of interest, including external services, that are not affiliated with us.

## 7. PERIOD OF RETENTION OF PERSONAL DATA (SO-CALLED DATA RETENTION)

Personal data is stored primarily using both paper and digital methods in Italy, within the European Union, and specifically outside the Data Controller's headquarters, in full compliance with the provisions and requirements necessary for the security and proper location of data storage devices. Digital storage methods are limited to the sending of documentation and are carried out in full compliance with the provisions and requirements necessary for the security and proper location of data storage devices (PCs and secure backup devices) as well as for the security of paper archives.

The Data Controller will process personal data for the time necessary to fulfill the aforementioned purposes and, in any case, for no longer than the termination of the relationship for Service Purposes. It is assumed that the Data Controller will process personal data for the time necessary to fulfill the aforementioned purposes and, in any case, for no longer than 10 years from the termination of the relationship for invoicing and accounting Service Purposes. For direct and indirect marketing purposes, please note that the retention period does not exceed 24 months from the date of re-acquisition.

### **Data retention period for data processing carried out by this website:**

Personal data will be processed and stored for the time necessary for the purposes for which they were collected.

Therefore:

Personal Data collected for purposes related to the performance of a contract between the Owner and the User will be retained until such contract has been fully executed.

Personal Data collected for the purposes of the Data Controller's legitimate interests will be retained for as long as necessary to fulfill such purposes. Users can find specific information on the legitimate interests pursued by the Data Controller in the relevant sections of this document or by contacting the Data Controller.

The Data Controller may be authorized to retain Personal Data for a longer period if the User has given their consent to such processing, provided that such consent is not withdrawn. Furthermore, the Data Controller may be required to retain Personal Data for a longer period if required to do so by legal obligation or by order of an authority.

Once the retention period expires, the Personal Data will be deleted. Therefore, the right of access, the right to erasure, the right to rectification, and the right to data portability cannot be exercised after the retention period expires.

## 8. COOKIE BANNER TEXT

We and selected third parties use cookies or similar technologies for technical purposes and, with your consent, also for experience purposes as specified in the cookie policy.

You can freely give, refuse, or revoke your consent at any time by accessing the preferences panel. Refusing consent may make the relevant functions unavailable. Use the "Accept all" button to consent. Use the "Reject all" button or close this notice to continue without accepting. Use the "Accept" button to consent. Use the "Reject" button or close this notice to continue without accepting.

## 9. TRANSFERS OUTSIDE THE EU/EEA

In managing customer relationships, no data transfer to third countries or international organizations is envisaged.

If it becomes necessary to transfer personal data outside the European Union to countries not considered adequate by the European Commission, the Data Controller will ensure that appropriate or adequate safeguards are implemented to protect personal data and that the transfer of such data complies with applicable data protection laws.

Any transfer of data subjects' data to countries outside the European Union will, in any case, take place in compliance with appropriate and suitable safeguards for the purposes of the transfer itself, pursuant to applicable legislation and in particular Articles 45 and 46 of the Regulation.

Accordingly, where required by applicable data protection laws, the Data Controller will ensure that service providers sign the Standard Contractual Clauses approved by the European Commission.

## 10. RIGHTS OF THE INTERESTED PARTY

As a user, you have the following rights:

**-Right to access your data, obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet registered, and their communication in an intelligible form;** - obtain information on: a) the source of the personal data; b) the purposes and methods of the processing; c) the logic applied in the event of processing carried out with the aid of electronic means; d) the identification details of the data controller, data processors, the data controller's representative, and the persons designated as authorized to process the data; e) the entities or categories of entities to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative(s) in the territory of the State, data processor(s), or authorized to process the data; (Article 15 GDPR).

**-Right to update, rectification** or, when there is interest, integration of the data; (Article 16 GDPR).

**-Right to erasure, anonymization or blocking of data** and data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; (Article 17 of the GDPR).

**-Right to request the restriction of data processing solely for reasons of public interest and for the establishment or defense of legal claims, in cases where the data subject disputes the accuracy of the data and its processing, in the event of exercising the right to object to processing pursuant to Art. 21 GDPR, and in the other cases provided for by Art. 18 GDPR;** (Article 18 GDPR).

**-Right to receive personal data provided to the owner** of the processing in a structural format or on a commonly used, intelligible, and accessible electronic medium for any operating system (USB or duly encrypted ZIP file), and to move, without restriction, the information and data relating to you from this controller or from another

controller chosen by you based on your purposes and in full compliance with the principles of transparency, lawfulness, and proportionality of the processing. This right to data portability does not affect other rights; (Article 20 GDPR).

-Right to object, in whole or in part:

a) for legitimate reasons, to the processing of your personal data, even if pertinent to the purpose of the collection; b) to the processing of your personal data for any other purpose not pertinent to the processing; (Article 21 GDPR).

-**Right to withdraw consent**, where applicable and at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent given before its withdrawal;

-**Right to lodge a complaint with the supervisory authority.**

## 11. HOW TO EXERCISE YOUR RIGHTS

You may exercise your rights at any time by sending a request via email to the email address indicated in point 1 of this data protection information. by writing to the data controller's Privacy Office, or by asking the Privacy Office or the data controller.

You may also exercise your rights by contacting the Privacy Guarantor, with headquarters in Piazza Venezia n. 11 – 00187 Rome, Telephone: (+39) 06.696771, Fax: (+39) 06.69677.3785. For general information, you can send an email to: [protocollo@gdpd.it](mailto:protocollo@gdpd.it), [protocollo@pec.gdpd.it](mailto:protocollo@pec.gdpd.it)

## 12. CHANGES TO THIS NOTICE

The Data Controller reserves the right to make changes to this Privacy Policy at any time by giving notice to users on this site. Therefore, please check this page often, referring to the last modification date indicated at the bottom of the document. If you do not accept the changes made to this Privacy Policy, you may request the Data Controller to delete your personal data.

## 13. MATERIALS

All content on the Websites (not uploaded by users) is part of the data controller's own archive (including joint data controllers), including images. Some photographic materials are taken from online archives. When registering and uploading content, whether photographic or textual, for publication on the Websites, users declare that they own the rights (including for commercial purposes) to the uploaded images. Therefore, users assume full responsibility for the origin and legality of the images uploaded to the Websites.

## 14. PROCEDURE FOR REVOKING CONSENT TO DATA PROCESSING

Dear user, you may request the revocation of one or more of the privacy consents listed below by sending an email to the address indicated in point 1 of this data protection notice and indicating one or more options you wish to revoke.

- Revoke Communications by email
- Revoke third-party marketing communications via email

Once your request is received, it will generally be processed within 48 hours.

HOW TO DISABLE COOKIES IN ANY BROWSERS USED BY THE USER FOR BROWSING BY CONFIGURING THE BROWSER?

*Chrome*

1. Run the Chrome browser
2. Click the menu on the browser's toolbar next to the URL entry box for navigation
3. Select Settings
4. Click Show Advanced Settings
5. In the "Privacy" section, click on the "Content settings" button
6. In the "Cookies" section you can change the following cookie settings:
  - Allow local data to be saved
  - Modify local data only until the browser is closed
  - Prevent sites from setting cookies
  - Block third-party cookies and site data
  - Manage exceptions for some websites
  - Delete one or all cookies

For more information visit the [dedicated page](#).

#### *Mozilla Firefox*

1. Run the Mozilla Firefox browser
2. Click the menu on the browser's toolbar next to the URL entry box for navigation
3. Select Options
4. Select the Privacy panel
5. Click Show Advanced Settings
6. In the "Privacy" section, click on the "Content settings" button
7. In the "Tracking" section you can change the following cookie settings:
  - Ask sites not to track you
  - Tell sites you are willing to be tracked
  - Do not communicate any preferences regarding the tracking of personal data
8. From the "History" section you can:
  - By enabling "Use custom settings" you can select to accept third-party cookies (always, from the most visited sites or never) and to store them for a specific period (until they expire, until Firefox is closed or until you ask each time)
  - Remove individual stored cookies.

For more information visit the [dedicated page](#).

#### *Internet Explorer/Edge*

1. Run Internet Explorer/Edge browser
2. Click the Tools button and choose Internet Options
3. Click the Privacy tab and in the Settings section, adjust the slider according to the action you want for cookies:

- Block all cookies

Allow all cookies

- Selection of sites from which to obtain cookies: move the cursor to an intermediate position so as not to block or allow

all cookies, then click on Sites, in the Website Address box enter a website and then click on Block or Allow

For more information visit the [dedicated page](#).

#### *Safari 6*

1. Run the Safari browser
2. Click on Safari, select Preferences and press Privacy
3. In the Block Cookies section, specify how Safari should accept cookies from websites.
4. To see which sites have stored cookies, click on Details

For more information visit the [dedicated page](#).

#### *Safari iOS (mobile devices)*

1. Run the iOS Safari Browser
2. Tap Settings and then Safari
3. Tap on Block Cookies and choose between the various options: "Never", "Third-party and advertisers" or "Always"

4. To delete all cookies stored by Safari, tap Settings, then Safari, and finally Clear Cookies and Data

For more information visit the [dedicated page](#).

*Opera*

1. Run the Opera Browser

2. Click on Preferences, then on Advanced, and finally on Cookies.

3. Select one of the following options:

- Accept all cookies
- Accept cookies only from the site you are visiting: third-party cookies and those sent from a domain other than the one you are visiting will be rejected
- Never accept cookies: all cookies will never be saved

For more information, visit the dedicated page.

## **15. DEFINITIONS AND LEGAL REFERENCES**

**Personal Data (or Data)**

Personal data is any information that, directly or indirectly, even in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.

**Usage Data**

This information is collected automatically through this Application (including third-party applications integrated into this Application), including: the IP addresses or domain names of the computers used by the User who connects to this Application, the URI (Uniform Resource Identifier) addresses, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (for example, the time spent on each page) and the details relating to the path followed within the Application, with particular reference to the sequence of pages visited, the parameters relating to the operating system and the IT environment of the User.

**User**

The individual who uses this Application who, unless otherwise specified, coincides with the Data Subject.

**Interested**

The natural person to whom the Personal Data refers.

**Data Controller (or Controller)**

The natural person, legal person, public administration or any other entity that processes personal data on behalf of the Data Controller, as set out in this privacy policy.

**Data Controller (or Owner)**

The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data and the tools used, including the security measures relating to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

**This Application**

The hardware or software tool by which the Personal Data of Users is collected and processed.

**Service**

The Service provided by this Application as defined in the relevant terms (if any) on this site/application.

**European Union (or EU)**

Unless otherwise specified, any reference to the European Union contained in this document shall be deemed to extend to all current member states of the European Union and the European Economic Area.

Cookie

Cookies are Tracking Tools that consist of small portions of data stored within the User's browser.

Tracking Tool

By Tracking Tool we mean any technology—e.g., cookies, unique identifiers, web beacons, embedded scripts, e-tags, and fingerprinting—that allows Users to be tracked, for example by collecting or storing information on the User's device.

*Legal references*

This privacy policy is drafted on the basis of multiple legislative provisions, including Articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy policy applies exclusively to this Application.

## 16. ACCEPTABLE USE POLICY FOR WEBSITE USERS

### **Prohibited use**

You may not use the Services to post content or engage in any activity that is unlawful under applicable law, harmful to others, or that may expose us to liability, including, but not limited to, the following activities, each of which is prohibited by this AUP:

- Phishing or identity theft
- Distribution of computer viruses, worms, Trojan horses (TROJAN) or other malicious code (MALWARE, RANSOMWARE, etc.).
- Distribute pornography or adult content or offer escort services.
- Promote or facilitate violence or terrorist activities
- Infringement of the intellectual property or other proprietary rights of others.

### **Application**

Your services may be suspended or terminated with or without notice if you violate this policy. Any violation may result in the immediate suspension or termination of your account.

### **Reporting Violations**

To report a violation of this policy, please contact us as per Section 11 of this policy.

We reserve the right to modify this policy at any time, and you will be promptly updated. To ensure you are up-to-date on the latest changes, we recommend that you visit this page frequently.

## 17. DATA DELETION PROCEDURE

Request for Deletion of Personal Data

Users have the right to request the deletion of their personal data in accordance with Article 17 of European Regulation 2016/679 (GDPR). To exercise this right, users can send a written request to the email address listed in Section 1 of this policy or use the form available on our website.

The request must contain the following information:

**Name and surname**

**Email address used for registration**

**A clear description of the deletion request**

We are committed to responding to all deletion requests without undue delay and, in any case, within one month of receiving the request. If we need additional information to verify your identity, we reserve the right to extend the response deadline by up to two months, informing you of the reason for the delay. Please note that there may be circumstances in which we cannot proceed with data deletion, for example, if the data is required to comply with legal obligations or for archiving purposes. In such cases, we will inform you of the reasons why we cannot proceed with the request. To request data deletion, please visit the following link:

[https://www.registro-osteopati-italia.com/wp-content/uploads/modulo\\_cancellazione\\_dati.pdf](https://www.registro-osteopati-italia.com/wp-content/uploads/modulo_cancellazione_dati.pdf)

**For members:**

To process your personal data, your explicit consent is required. We therefore ask you to carefully read the attached privacy policy and sign the attached consent form. Complete the form and send it to our email address, or you can complete the privacy consent form by accessing the link <https://www.registro-osteopati-italia.com/modifica-profilo-socioby> entering the “Edit member profile” section in the “Personal Area”.