

PERSONAL DATA PROCESSING NOTICE FOR THE DR.TRAVEL SERVICE USER REIMBURSEMENT PROCEDURE

(pursuant to articles 13 and 14 of EU Regulation no. 2016/679 and Italian Legislative Decree 196/2013 updated as per Italian Legislative Decree 101/2018)

1- WHAT PERSONAL INFORMATION DO WE COLLECT? WHY?

During the reimbursement procedure for the Dr.Travel service, SOSTRAVEL.COM S.p.A. may collect the following information about you.

- Username for the activation of the service
- First name, surname, and date of birth of the user (or the patient, if different from the user)
- Contact details (telephone, e-mail);
- access and navigation data related to the use of the App;
- Language spoken
- First name, surname, and degree of kinship of the people added to the Family package
- Receipt of payment for the service and QR code printed on the same receipt
- A copy of the diagnosis made via the HPP portal, accessible via the app, and a copy of the new diagnosis(es) indicating a misdiagnosis by Dr. Travel.

Subject to consent, pursuant to article 9 section 2.a of EU Regulation 2016/679, the personal data, with particular reference to those regarding health, are processed in order to:

a. Authorise, via the app, the activation of the Dr Travel service, and commence the reimbursement procedures if the user has requested a second diagnosis because he/she is not satisfied with the one provided by Dr Travel.

Ordinary data such as first name, surname, and bank details may be processed to:

b. Ensure the company is legally protected in case of disputes with the customer (article 6 section 1.f of EU Regulation 2016/679)

c. Issue payments entitled to and requested by the customer (article 6 section 1.b of EU Regulation 2016/679)

2- HOW DO WE HANDLE YOUR DATA AND FOR HOW LONG?

The processing of your personal data is carried out by means of the operations indicated in art. 4 of EU regulation no. 2016/679, namely: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Personal data are processed both on paper and electronically. The Data Controller will process personal data for the time necessary for the purposes for which they were collected or subsequently processed, according to art 5, e) of EU regulation no. 2016/679, in particular:

- The data acquired during the reimbursement management procedure are stored for maximum 10 years from the date on which the request is fulfilled then automatically deleted thereafter;

In the event that you terminate the established relationship, sostravel.com will retain only the data expressly requested or required by law, and only for the time specified by law.

3- WHO COULD HAVE ACCESS TO YOUR DATA?

Your data may be made accessible for the purposes referred to in point 1 of this Notice:

- to employees and collaborators of the Data Controller in their capacity as data processors including: consultancy companies, companies in charge of maintenance or management of the IT system and the website, professional firms providing accounting and tax services; law firms and quality certification bodies; Contact Center;
- to companies and third parties acting as independent Data Controllers such as: banks, credit institutions, insurance companies; inspection bodies in case of checks or controls.

The data will not be disclosed to third parties in any way.

4- COULD YOUR DATA BE TRANSFERRED TO COUNTRIES OUTSIDE THE EU?

YES. We hereby inform you that some of our suppliers who are Data Processors (the Contact Center) and some trading partners who are Joint Controllers (in this case HPP Service for the Service of Dr. Travel) have registered offices in countries outside the EU (Moldavia and USA).

The transferral of data to these countries is subject to the presence of the adequate guarantees established pursuant to article 46 of EU Regulation 2016/679. The data subject can view the standard contractual clauses that regulate the guarantees established with suppliers and partners using the contact details indicated at point 7 of the Notice.

5- IS IT NECESSARY TO PROVIDE YOUR DATA? WHAT HAPPENS IF YOU DO NOT GIVE CONSENT?

Conferral of your personal data, together with the requested authorisations, is strictly necessary to ensure the correct evaluation and management of the reimbursement procedure.

6- WHAT RIGHTS ARE GUARANTEED BY LAW?

According to EU Regulation 2016/679-Cap.III:

1.The data subject has the right to obtain confirmation of whether or not personal data concerning him/her exist, even if not yet recorded, and to receive communications in intelligible form.

2.The data subject has the right to obtain information about the origin of the personal data; the purposes and methods of processing; the logic applied in case of processing with electronic instruments; the identification details of the data controller, the data processors and any appointed representative as stated in article 5, paragraph 2; of subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representatives in the territory of the State, of managers or other individuals in charge.

3. The data subject has the right to obtain:

- a. updates, corrections or, if necessary, the integration of data. Regarding changes to the data entered in the Dr. Travel app, the user must contact the sostravel Contact Center by sending an email to customercare@sostravel.com. The Contact Center will communicate the changes to be made to the partner companies.

b. the erasure, transformation into anonymous form or blocking of unlawfully processed data, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed. As part of the Dr. Travel service, the user has the right to request the deletion of the documents uploaded to the partner's platform;

c. confirmation that the operations referred to in paragraphs 3.a. and 3.b above, as well as their content, have been brought to the attention of those to whom the data had been communicated or disseminated, except in cases where fulfilling this condition proves impossible or requires the use of means manifestly disproportionate to the protected right;

d. a copy of the information we hold in a common and interoperable format;

e. limitation of processing of personal data about him/her, or to oppose the processing of personal data about him/her, in whole or in part, for legitimate reasons, even if the data are relevant to the purpose for which they are being collected.

Furthermore, the data subject has the right to:

f. withdraw consent at any time, without prejudice to the lawfulness of data processing that was based on consent before revocation.

Data subjects who believe that the processing of personal data relating to them carried out through the website or app are in violation of the Regulation have the right to lodge a complaint with the Guarantor, as provided for by art. 77 of the Regulation, or to bring proceedings to the appropriate courts (art. 79 of the Regulation).

A formal statement may be requested from the data controller certifying that the data subject's requests have been effectively resolved and brought to the attention of those to whom data had previously been disseminated and disclosed.

As a data subject, you may also designate a third person with a copy of a power of attorney, or of a proxy signed in the presence of an official, or a proxy signed and presented with an unauthenticated photocopy of the data subject's identification document.

The data controller is obliged to reply to the request within 15 days from the date of submission or 30 days if the answer is problematic. In any case, within 15 days you will be notified in writing of any reason for delay.

7- HOW CAN I EXERCISE THESE RIGHTS?

You may exercise your rights at any time by sending a request to the following contacts:

Data Controller: sostravel.com S.p.a.

-via Marsala 34/A - 21013 Gallarate (VA)

- e-mail sostravel@pec.net

- Phone +3903311587117

- Fax+39033111582452.

Director of Personal Data Protection.

Virginia G.Basiricò, via Marsala 34/A - 21013

Gallarate (VA)

- e-mail privacy@sostravel.com - Tel+3903311587117

- Fax +39033111582452.

8- 'PRIVACY POLICY UPDATES

This information was last updated on 11 December 2020 and may be subject to periodic review, for instance in relation to relevant legislation and jurisprudence.

In case of significant changes, appropriate communication will be given for a reasonable time in the homepage of the website or through e-mail. However, data subjects are invited to periodically consult this Policy.