

Privacy policy on the processing of personal data

This privacy policy applies to the processing of personal data by Movendo Technology S.r.l., in compliance with the provisions of Regulation (EU) 2016/679 (hereinafter, “**GDPR**”), Decree 196 dated June 30, 2003 (hereinafter, “**Privacy Code**”), and other applicable instructions and measures (hereinafter, together, “**Applicable Regulations**”).

1. Data Controller

The data controller of processing is Movendo Technology S.r.l., with registered office at Calata Cattaneo 15, 16128, Genoa (hereinafter, “**Movendo**”, “**Company**” or “**Data Controller**”). For all questions about the processing of personal data, please contact the Data Controller at the following e-mail address: privacy@movendo.technology.

2. Recipients of the privacy policy

This privacy policy is for users of the website <https://www.movendo.technology/> (hereinafter, “**Website**”) and all those whose personal data is processed by the Company, in connection with use of any of the devices (hereinafter, “**Devices**”) commercialized by the Company, or whose data is collected by the Company at trade fairs and/or events, for any of the purposes indicated in section 3 below (hereinafter, “**Data Subjects**”).

3. Personal data processed and source

The processing carried out pursuant to this privacy policy relates to the following personal data of each Data Subject (hereinafter, “**Data**”):

- general data: identification data (such as name, surname, date of birth, place of birth), contact information (e-mail address), data included in requests made via the “contact us” section of the Website and data included in CVs submitted when applying for a job with the Company (such as prior professional experience and/or academic qualifications, abilities/skills, hobbies);
- browsing data: data collected by the Company while the users browse the Website (ID and technical information about their devices, details of the web browsers used, IP addresses and other parameters and/or information about their operating systems and IT environment, collected via the use of cookies and similar technologies);

See the Cookie Policy, available on website, for further information about the Cookies and/or other tracking technologies used by the Website.

Data may be collected from:

- the Data Subject, *e.g.* when browsing or interacting with the Website or when contacting Movendo at trade fairs and/or events and/or during other direct interactions with Movendo;
- third parties, *i.e.* the clinic where the Data Subject works/collaborates as a physiotherapist. In that

case, the Data - in particular, the contact data - of the Data Subject will be processed in order to supply access credentials to the private area of the Website (as described better in section 4, letter c) below);

- partners of Movendo, in relation to the implementation of research projects (as described better in section 4, letter h) below). The Data will only be collected by the Data Controller if the Data Subject has given consent.

4. Purposes, lawfulness of processing and Data retention period

The Data belonging to Data Subjects will be processed by the Data Controller in compliance with the Applicable Regulations, solely for the following purposes:

| Purpose of processing | Lawful basis | Data retention period |
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| a) Allow Data Subjects to use the Website. | Take steps at the request of the Data Subject prior to entering into a contract or perform a contract to which the Data Subject is a party (art. 6(1)(b) GDPR). | The time strictly necessary to achieve those purposes and, in any case, for a period not exceeding [<i>30 days from collection</i>], unless it is necessary to retain the Data for a longer period in order to comply with a legal obligation or an order from an authority, or to defend a right of the Company. |
| b) Respond to requests made by Data Subjects via the Website or the contact channels indicated therein. | Take steps at the request of the Data Subject prior to entering into a contract or perform a contract to which the Data Subject is a party (art. 6(1)(b) GDPR). | The time strictly necessary to achieve those purposes and, in any case, for a period not exceeding [<i>90 days</i>] from satisfaction of the request, unless it is necessary to retain the Data for a longer period in order to comply with a legal obligation, or an order from an authority, or to defend a right of the Company. |
| c) Provide entitled Data Subjects with access credentials to the private area of the Website and allow them access to it, as well as to send technical communications regarding the Device (e.g. release of a new update). | Take steps at the request of the Data Subject prior to entering into a contract or perform a contract to which the Data Subject is a party (art. 6(1)(b) GDPR). | The time strictly necessary to achieve those purposes and, in any case, for a period not exceeding [<i>30 days</i>] from termination of the relationship pursuant to which the Device is used, unless it is necessary to retain the Data for a longer period in order to comply with a legal obligation, or an order from an authority, or to defend a right of the Company. |

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| d) Process job applications submitted by Data Subjects via the “work for us” section of the Website. | Take steps at the request of the Data Subject prior to entering into a contract or perform a contract to which the Data Subject is a party (art. 6(1)(b) GDPR). | The time strictly necessary to achieve those purposes and, in any case, for a period not exceeding [12 months] from closure of the selection process, unless it is necessary to retain the Data for a longer period in order to comply with a legal obligation or an order from an authority, or to defend a right of the Company. |
| e) Comply with the legal obligations of the Company and respond to requests from the competent authorities. | Comply with a legal obligation to which the Controller is subject (art. 6(1)(c) GDPR). | The time strictly necessary to achieve those purposes and, in any case, for a period not exceeding [10 years], unless it is necessary to retain the Data for a longer period in order to comply with a legal obligation or an order from an authority, or to defend a right of the Company. |
| f) Protect the rights of the Company and its employees and collaborators, both in and out of court. | Pursue the legitimate interests of the Controller (art. 6(1)(f) GDPR). | The time strictly necessary to achieve those purposes and, in any case, for a period not exceeding [10 years] from termination of the related proceedings, unless it is necessary to retain the Data for a longer period in order to comply with a legal obligation or an order from an authority, or to defend a right of the Company. |
| g) Perform special transactions (including mergers, acquisitions, business reorganizations), to the extent strictly necessary in order to pursue that purpose. | Pursue the legitimate interests of the Controller (art. 6(1)(f) GDPR). | The time strictly necessary to achieve those purposes and, in any case, for a period not exceeding [10 years] from completion of the transaction, unless it is necessary to retain the Data for a longer period in order to comply with a legal obligation or an order from an authority, or to defend a right of the Company. |
| h) Participate in research projects carried out by the Company, possibly with the involvement of third parties. | Consent of the Data Subject (art. 6(1)(a) GDPR). | The time strictly necessary to achieve those purposes and, in any case, for a period not exceeding [10 years] from completion of the related project, unless it is necessary to retain the Data for a longer period in order to comply with a legal obligation or an order from an |

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| | | authority, or to defend a right of the Company. |
| i) Send communications about the products and initiatives of the Controller, using automated tools (e.g. e-mail). | Consent of the Data Subject (art. 6(1)(a) GDPR). | The time strictly necessary to achieve those purposes and, in any case, for a period not exceeding [<i>12 months</i>] from the revocation of consent, unless it is necessary to retain the Data for a longer period in order to comply with a legal obligation or an order from an authority, or to defend a right of the Company. |

Provision of the Data for the purposes indicated in points a) to g) above is necessary in order to use the Website and (with specific reference to point c)) the Devices of the Company. Any refusal by Data Subjects to provide such Data will make it impossible for the Data Controller to allow use of the Website and/or its Devices by them. Provision of the Data for the purposes indicated in points h) and i) is not necessary in order to use the Website and/or the Devices. However, any refusal by Data Subjects to provide such Data will make it impossible for the Data Controller, respectively, to allow them to participate in its research projects and to keep them updated about its products and/or initiatives.

5. Methods of processing

In relation to the above-mentioned purposes, the Data will be processed both manually and using IT or automated equipment, adopting suitable procedures and tools that guarantee its security and confidentiality in compliance with the Applicable Regulations.

6. Categories of parties to which the Data may be communicated

To the extent necessary in pursuit of the purposes described in section 4 above, the Data may be communicated to the following categories of parties:

- (i) other companies within the Movendo group for administrative, accounting and/or legal reasons; as well as for the organization and execution of joint initiatives;
- (ii) companies that provide services connected with and/or contributory to the activities of the Data Controller (companies that supply the Company with IT and/or data storage services and/or administrative, accounting and/or legal services);
- (iii) clinics for which the Data Subjects work;
- (iv) independent authorities, the police and/or the judiciary, to the extent envisaged by law, in pursuit of their respective institutional objectives;
- (v) commercial partners of the Company for research purposes, following consent from the Data Subjects.

With reference to the Data communicated to them and depending on the circumstances, the above parties may act as Processors under specific agreements signed pursuant to art. 28 GDPR, or as independent controllers in accordance with their own privacy policy on the processing of personal data. At any time, the Data Controller may be contacted in the manner detailed in Section 1 above and requested to provide an updated list of those parties and their privacy status.

The Data belonging to the Data Subjects may also become known to persons designated by the Data Controller, who have received specific instructions in this regard.

The Data will not be disseminated under any circumstances.

7. Data Transfer

The Data will not be transferred outside of the European Economic Area.

8. Rights of Data Subjects

Without prejudice to the right of Data Subjects to refuse provision of their Data (subject to the effects indicated in section 4 above) and to the extent applicable to the processing described in this privacy policy and allowed pursuant to the Applicable Regulations, Data Subjects are entitled to obtain at any time and without charge:

- confirmation as to whether or not their Data is held;
- access to their Data and, among other matters, to information about the sources of such Data, the purposes and methods of processing, and the logic applied for any processing that is part of an automated decision-making process;
- rectification or completion of their Data;
- erasure of their Data;
- erasure of their Data without undue delay;
- portability of their Data.

To the extent applicable to the processing described in this privacy policy and allowed pursuant to the Applicable Regulations, Data Subjects are also entitled to:

- object to processing at any time and/or request its restriction;
- revoke any consent given;
- file a complaint with the competent data protection authority (in Italy, the Italian Data Protection Authority – il Garante).

The related written requests may be submitted to the Data Controller at the following e-mail address:

privacy@movendo.technology

9. Amendments and updates

This privacy policy may be amended or updated, not least as a consequence of changes made to the Applicable Regulations.

Last update: September 2021

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Consent for the processing of personal data

I confirm having received and understood the privacy policy on the processing of personal data contained in the documentation made available to me, and:

Give consent

Deny consent

for the processing of my personal data in order to participate in research projects carried out by the Data Controller, as indicated in section 4, point h) of the privacy policy.

Give consent

Deny consent

for the processing of my personal data in order to send communications about the products and initiatives of the Data Controller, using automated tools (e.g. e-mail), as indicated in section 4, point i) of the privacy policy.

Date: _____

Name: _____

Surname: _____

Signature of the Data Subject:
