

WITA.CARE WEBSITE PRIVACY POLICY

When you use our WITA.CARE website, you trust us with your information. This Privacy Policy is meant to help you understand what data we collect, why we collect it and what we do with it. This is important; we hope you will take time to read it carefully.

Privacy Policy

Last modified: 01 September 2020

There are many different ways that you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a WITA.CARE Account, we can make those services even better – to show you more relevant search results, to help you connect with people or to make sharing with others quicker and easier. As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms, such as cookies, IP addresses, pixel tags and browsers, then read about these key terms first. Your privacy matters to WITA, so whether you are new to WITA or a long-time user, please do take the time to get to know our practices – and if you have any questions, contact us at wita@wita.care.

Why we collect information

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which information you'll find most useful or which information on our websites you might like. When collecting information, we do so by following two main principles:

- Fulfillment of a Customer request - to improve customer relationships (order management, issue invoices, quotes), to perform any contractual obligations, to minimise dispute and as well as to comply with regulatory obligations, and more generally to respond to customer requests.
- Promote customer loyalty and marketing - WITA collects contact data, interests, other personal data through the website to optimise commercial offer, to be able to send regular

information on its offers, products, news and events related to WITA, to perform market analysis and user satisfaction surveys.

We consider legitimate to process your data for these purposes. You have the rights to object, at any time and free of charge, to the processing of your personal data as explained in the reminder of this Privacy Notice.

Information we collect

We collect information in the following ways:

- Information you give us. For example, some of our services require you to sign up for a WITA.CARE Account. When you do, we'll ask for personal information, like your name, email address, telephone number, etc. to store with your account.
- Information we get from your use of our services. We collect information about the services that you use and how you use them, like when your browser through our website and interact with our content. This information includes:
 - Device information. We collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number). WITA.CARE may associate your device identifiers or phone number with your WITA.CARE Account.
 - Log information. When you use our services or view content provided by WITA.CARE, we automatically collect and store certain information in server logs. This includes:
 - details of how you used our service, such as your search queries.
 - telephony log information, such as your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
 - Internet protocol address.
 - device event information, such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
 - cookies that may uniquely identify your browser or your WITA.CARE Account.
- Location information. When you use WITA.CARE services, we may collect and process information about your actual location. We use various technologies to determine location, including IP address, GPS and other sensors that may, for example, provide WITA.CARE with information on nearby devices, Wi-Fi access points and mobile towers.
- Unique application numbers. Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to WITA.CARE when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.

- Local storage. We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.
- Cookies and similar technologies. We and our partners use various technologies to collect and store information when you visit a WITA.CARE service, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with services we offer. Additional details on cookies used are available within the Cookies Policy document.

Information we collect when you are signed in to WITA.CARE, in addition to information we obtain about you from partners, may be associated with your WITA.CARE Account. When information is associated with your WITA.CARE Account, we treat it as personal information. For more information about how you can access, manage or delete information that is associated with your WITA.CARE Account, visit the Transparency and choice section of this policy.

Data collection duration

The data are stored for the period necessary to carry on business activities and in any case for duration not exceeding ten years. Storage for longer times may be possible if strictly necessary in relation to the exercise of jurisdictional protections and / or the fulfillment of regulatory obligations.

How we use information that we collect

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new ones and to protect WITA.CARE and our users. We also use this information to offer you tailored content – like sending you more relevant updates on our products and events.

We may use the name that you provide for your WITA.CARE Profile across all of the services we offer that require a WITA.CARE Account. In addition, we may replace past names associated with your WITA.CARE Account, so that you are represented consistently across all our services. If other users already have your email or other information that identifies you, we may show them your publicly visible WITA.CARE Profile information, such as your name and photo.

If you have a WITA.CARE Account, we may display your Profile name, Profile photo, and actions you take on WITA.CARE or on third-party applications connected to your WITA.CARE Account (such as +1's, reviews you write and comments you post) in our services. We will respect the choices you make to limit sharing or visibility settings in your WITA.CARE Account.

When you contact WITA, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like pixel tags, to improve your user experience and the overall quality of our services. One of the products we use to do this on our own services are listed in our WITA.CARE Website Cookie Policy document. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. When

showing you tailored content, we will not associate an identifier from cookies or similar technologies with sensitive categories, such as those based on race, religion, sexual orientation or health.

We may combine personal information from one service with information, including personal information, from other WITA.CARE services – for example, to make it easier to share information with people you know. Depending on your account settings, your activity on other sites and apps may be associated with your personal information in order to improve WITA.CARE’s services and the ads delivered by WITA.CARE.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

WITA.CARE processes personal information on our servers located in Europe.

Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can review and control certain types of information tied to your WITA.CARE Account by using WITA.CARE account on our website.

You may also set your browser to block all cookies, including cookies associated with our services or to indicate when a cookie is being set by us. However, it’s important to remember that many of our services may not function properly if your cookies are disabled. For example, we may not remember your language preferences.

Accessing and updating your personal information

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so free of charge, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

Information that we share

We may share personal information collected through this website with companies, organisations and individuals from sister companies of WITA, which belong to the same Gruppo Waldner. We do not

share personal information collected through this website with companies, organisations and individuals from companies external to the Gruppo Waldner, unless one of the following circumstances applies:

- With your consent. We will share personal information with companies, organisations or individuals outside WITA or Gruppo Waldner when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information.
- For external processing. We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.
- For legal reasons. We will share personal information with companies, organisations or individuals outside WITA.CARE if we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to:
 - meet any applicable law, regulation, legal process or enforceable governmental request.
 - enforce applicable Terms of Service, including investigation of potential violations.
 - detect, prevent or otherwise address fraud, security or technical issues.
 - protect against harm to the rights, property or safety of WITA.CARE, our users or the public, as required or permitted by law.

We may share non-personally identifiable information publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If WITA.CARE is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

Your WITA.CARE Account is managed for you by one of our domain administrators (for example, for WITA.CARE Apps users) who will have access to your WITA.CARE Account information (including your emails and other data). Your domain administrator may be able to:

- view statistics regarding your account, such as statistics regarding applications that you install.
- change your account password.
- suspend or terminate your account access.
- access or retain information stored as part of your account.
- receive your account information in order to satisfy applicable law, regulation, legal process or enforceable governmental request.
- restrict your ability to delete or edit information or privacy settings. Please refer to your domain administrator's privacy policy for more information.

It is important to note that personal information collected through this website may be transferred to countries of the European Union or to third countries with respect to those of the European Union or to an international organization, within the purposes mentioned above. The interested party will be informed whether or not there is an adequacy decision by the EU Commission.

Information security

We work hard to protect WITA.CARE and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information that we hold. In particular:

- We encrypt many of our services using SSL.
- We may offer you two-step verification when you access your WITA.CARE Account and a Safe Browsing feature in WITA.CARE Chrome.
- We regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.
- We restrict access to personal information to WITA.CARE employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered by WITA.CARE through this website but it excludes services that have separate privacy policies that do not incorporate this Privacy Policy, most notably the software belonging to the WITA.CARE product suite, although a single sign on may allow users to use the same credentials for their online WITA.CARE account and their WITA.CARE product log-in.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include WITA.CARE services or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organisations that advertise our services and that may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. We also adhere to several regulatory frameworks, including, but not limited to, national or European ones. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Other useful privacy and security-related materials

Further useful privacy and security-related materials can be found through WITA.CARE's policies and principles pages, including:

- WITA.CARE General Conditions of Services.
- WITA.CARE General Conditions of Use.
- WITA.CARE Cookie Policy.
- WITA.CARE Privacy Impact Assessment.

We keep your personal information private and safe — and put you in control.

Any user of the WITA.CARE website has the right to:

- to access, rectification, cancellation, limitation and oppose to data processing;
- to obtain data in a machine-readable format without hindrance from the data controller to be able to transmit them to another data controller;
- to withdraw consent to data treatment, without prejudice to the lawfulness of the treatment based on the acquired consent before revocation;
- to file a complaint with the authority responsible for the protection of personal data.

The exercise any of the aforementioned rights, the user must send a written communication via e-mail or registered letter with return receipt to WITA to the contact details provided in the following section.

Formal data

The data owner is WITA Srl, Via della Cooperazione, 105 – 38123 Trento, Italy legally represented by Mr Giuseppe Waldner. E-mail: wita@wita.care. WITA has appointed a Data Protection Officer within its sister company Waldner Tecnologie Medicali, who may be contacted at the e-mail address dpo@waldner.co