# **Privacy Policy of EMSA**

EMSA collects some Personal Data from its Users.

## **Owner and Data Controller**

English Medical Students' Association Strada Piezișă 25, Cluj-Napoca 400000 - România

Owner contact email: merch@umfclujemsa.com

## **Types of Data collected**

Among the types of Personal Data that EMSA collects, by itself or through third parties, there are: Tracker; Usage Data; first name; last name; email address; username; device information; Data communicated while using the service; payment info; phone number; billing address; shipping address; purchase history; User ID; Data communicated in order to use the Service; company name; country; city; date of birth; gender; geographic position; language; picture; profession; screenshots; ZIP/Postal code; VAT Number; workplace; physical address; fax number; state; county; various types of Data; Tax ID; field of activity; number of employees; website; profile picture; password; Social Security number (SSN); prefix; budget; academic background; Twitter handle; house number; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using EMSA. Unless specified otherwise, all Data requested by EMSA is mandatory and failure to provide this Data may make it impossible for EMSA to provide its services. In cases where EMSA specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by EMSA or by the owners of third-party services used by EMSA serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through EMSA.

## Mode and place of processing the Data

## Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of EMSA (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

#### **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

## **Retention time**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Registration and authentication, Access to third-party accounts, Analytics, Platform services and hosting, Interaction with live chat platforms, Interaction with data collection platforms and other third parties, Handling payments, Displaying content from external platforms, Backup saving and management, Connecting Data, Contacting the User, Content commenting, Handling activities related to productivity, Interaction with external social networks and platforms, Location-based interactions, Managing contacts and sending messages, Registration and authentication provided directly by EMSA, Social features, SPAM protection and Traffic optimization and distribution.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

## Access to third-party accounts

This type of service allows EMSA to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorization by the User.

#### Stripe account access

This service allows EMSA to connect with the User's account on Stripe, provided by Stripe, Inc.

Personal Data processed: Data communicated while using the service; device information; email address; first name; last name; payment info; Tracker; Usage Data; username.

Place of processing: United States – Privacy Policy; United Kingdom – Privacy Policy; European Union.

#### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

## **Wordpress Stats**

Wordpress Stats is an analytics service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

### YouTube Analytics and Reporting API

YouTube Analytics and Reporting API is a video content analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Through this Service, EMSA may collect Data directly or indirectly on or from Users' devices, including by making use of trackers. Users may restrict such access to their Data via the <u>security settings page</u> provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the <u>Network Advertising Initiative opt-out page</u>.

Personal Data processed: Data communicated in order to use the Service; Data communicated while using the service; device information; Tracker; Usage Data; User ID; username.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt out</u>.

## **Google Analytics (Universal Analytics)**

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of EMSA, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Opt Out; Ireland – Opt Out.

#### **Cloudflare Web Analytics (Cloudflare Inc.)**

Cloudflare Web Analytics is an anonymized analytics service provided by Cloudflare Inc. that gives the Owner insight into the use of EMSA by Users without needing to identify them. Further information may be found <a href="here">here</a> and within the service's privacy policy.

Personal Data processed: device information; language; Usage Data.

Place of processing: United States – Privacy Policy.

### **Simple Analytics (Simple Analytics)**

Simple Analytics is an anonymized analytics service provided by Simple Analytics that gives the Owner insight into the use of EMSA by Users without needing to identify them. Further information may be found <a href="here">here</a> and within the service's privacy policy.

Personal Data processed: device information; language; Usage Data.

Place of processing: Netherlands – <u>Privacy Policy</u>.

## Backup saving and management

This type of service allows the Owner to save and manage backups of EMSA on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to EMSA.

## **Backup on Google Drive**

Google Drive is a service to save and manage backups provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## **Connecting Data**

This type of service allows the Owner to connect Data with third-party services disclosed within this privacy policy. This results in Data flowing through these services, potentially causing the retention of this Data.

#### Zapier (Zapier, Inc.)

Zapier is a workflow automation service provided by Zapier, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; language; last name; phone number; picture; profession; screenshots; Tracker; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

Place of processing: United States – <u>Privacy Policy</u>.

## **Contacting the User**

## Contact form (EMSA)

By filling in the contact form with their Data, the User authorizes EMSA to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: city; company name; country; county; date of birth; email address; fax number; field of activity; first name; gender; last name; number of employees; phone number; physical address; profession; state; Tax ID; User ID; various types of Data; VAT Number; website; ZIP/Postal code.

#### Mailing list or newsletter (EMSA)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning EMSA. Your email address might also be added to this list as a result of signing up to EMSA or after making a purchase.

Personal Data processed: city; company name; country; county; date of birth; email address; first name; gender; last name; phone number; physical address; profession; state; Tracker; Usage Data; website; ZIP/Postal code.

#### Phone contact (EMSA)

Users that provided their phone number might be contacted for commercial or promotional purposes related to EMSA, as well as for fulfilling support requests.

Personal Data processed: phone number.

## **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of EMSA.

Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

#### Comment system managed directly (EMSA)

EMSA has its own internal content comment system.

Personal Data processed: email address; first name; last name; phone number; Tracker; Usage Data; username; website.

## Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of EMSA and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

## Video Vimeo (Vimeo, LLC)

Vimeo is a video content visualization service provided by Vimeo, LLC that allows EMSA to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

## YouTube video widget

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows EMSA to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

#### YouTube Data API

YouTube Data API is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows EMSA to incorporate functions normally executed on YouTube so that Users can watch, find, and manage YouTube content directly on EMSA.

Through this Service, EMSA may collect Data directly or indirectly on or from Users' devices, including by making use of Trackers. Users may restrict such access to their Data via the <u>security settings page</u> provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the <u>Network Advertising Initiative opt-out page</u>.

Personal Data processed: Data communicated in order to use the Service; Data communicated while using the service; device information; Tracker; Usage Data; User ID; username.

Place of processing: United States – Privacy Policy – Opt out; Ireland – Privacy Policy – Opt out.

### YouTube IFrame Player

YouTube IFrame Player is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows EMSA to incorporate content of this kind on its pages.

Through this Service, EMSA may collect Data directly or indirectly on or from Users' devices, including by making use of trackers. Users may restrict such access to their Data via the <u>security settings page</u> provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the <u>Network Advertising Initiative opt-out page</u>.

Personal Data processed: Data communicated in order to use the Service; Data communicated while using the service; device information; Tracker; Usage Data; User ID; username.

Place of processing: United States - <u>Privacy Policy</u> - <u>Opt out</u>; Ireland - <u>Privacy Policy</u> - <u>Opt out</u>.

#### Google Calendar widget

Google Calendar widget is a calendar content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows EMSA to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## Google Maps widget

Google Maps is a maps visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows EMSA to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

#### Instagram widget

Instagram is an image visualization service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that allows EMSA to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

### **Google Fonts**

Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows EMSA to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

#### YouTube video widget without cookies

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows EMSA to incorporate content of this kind on its pages.

This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on EMSA unless they play the video.

Personal Data processed: Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## Handling activities related to productivity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

## Gmail

Gmail is a service that manages email communication provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. Such email communication is not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside this service for advertising purposes in any other way.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; last name; phone number; physical address; profession; profile picture; screenshots; Tracker; Usage Data; username; VAT Number; workplace.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

#### **Google Docs**

Google Docs is an online text-editing and collaboration service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: city; company name; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; phone number; physical address; profession; profile picture; screenshots; Tracker; Usage Data; username; VAT Number; workplace.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

#### **Google Sheets**

Google Sheets is an online spreadsheet and collaboration service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; phone number; physical address; profession; profile picture; screenshots; Tracker; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## **Handling payments**

Unless otherwise specified, EMSA processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. EMSA isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

#### **Stripe**

Stripe is a payment service provided by Stripe Inc, Stripe Technology Europe Ltd or by Stripe Payments Ltd, depending on how the Owner manages the Data processing.

Personal Data processed: billing address; email address; first name; last name; payment info; purchase history; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy; United Kingdom – Privacy Policy.

#### **Android Pay**

Android Pay is a payment service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, which allows Users to make payments using their mobile phones.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; purchase history; shipping address; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## Apple Pay (Apple Inc.)

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; purchase history; shipping address; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

#### Google Pay

Google Pay is a payment service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, which allows users to make online payments using their Google credentials.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; purchase history; shipping address; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## Payment by bank transfer (EMSA)

In the event that the chosen payment method is a direct bank transfer to the current account indicated by EMSA, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: company name; first name; last name; payment info; physical address.

## PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data processed: billing address; device information; email address; first name; last name; password; payment info; phone number; purchase history; Tracker; Usage Data; username; various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – Privacy Policy.

## Paysafecard (Prepaid Services Company Limited)

Paysafecard is a payment service provided by Prepaid Services Company Limited.

Personal Data processed: billing address; device information; email address; first name; last name; payment info; phone number; purchase history; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – Privacy Policy.

## Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of EMSA for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

## Mailchimp widget (The Rocket Science Group LLC)

The Mailchimp widget is a service for interacting with the Mailchimp email address management and message sending service provided by The Rocket Science Group LLC.

Personal Data processed: email address; first name; last name; phone number; Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

## Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of EMSA. The interaction and information obtained through EMSA are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on EMSA isn't being connected back to the User's profile.

#### Facebook Like button and social widgets

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing,

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

#### LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

#### PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: See the PayPal privacy policy – <u>Privacy Policy</u>.

#### YouTube button and social widgets

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

## Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of EMSA, in order to contact and be contacted by EMSA's support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

#### **Facebook Messenger Customer Chat**

The Facebook Messenger Customer Chat is a service for interacting with the Facebook Messenger live chat platform provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing,

Personal Data processed: Data communicated while using the service; Tracker, Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

#### **Location-based interactions**

### **Geolocation (EMSA)**

EMSA may collect, use, and share User location Data in order to provide location-based services.

Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by EMSA.

Personal Data processed: geographic position.

## Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

#### Mailchimp (The Rocket Science Group LLC)

Mailchimp is an email address management and message sending service provided by The Rocket Science Group LLC.

Personal Data processed: company name; country; date of birth; email address; first name; gender; last name; phone number; physical address; Tracker; Usage Data; username; various types of Data.

Place of processing: United States – Privacy Policy.

## Platform services and hosting

These services have the purpose of hosting and running key components of EMSA, therefore allowing the provision of EMSA from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

#### WordPress.com

WordPress.com is a platform provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows the Owner to build, run and host EMSA.

Personal Data processed: billing address; Data communicated while using the service; device information; email address; first name; last name; payment info; phone number; shipping address; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## **Registration and authentication**

By registering or authenticating, Users allow EMSA to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, EMSA will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

#### Mailchimp OAuth (The Rocket Science Group LLC)

Mailchimp OAuth is a registration and authentication service provided by The Rocket Science Group LLC and is connected to the Mailchimp service.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

#### **Facebook Authentication**

Facebook Authentication is a registration and authentication service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

#### **Facebook Oauth**

Facebook Oauth is a registration and authentication service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

#### Google OAuth

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Google network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

#### **Instagram Authentication**

Instagram Authentication is a registration and authentication service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, and is connected to the Instagram social network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

#### **Stripe OAuth**

Stripe OAuth is a registration and authentication service provided by Stripe, Inc. and is connected to the Stripe network.

Personal Data processed: Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy; European Union - Privacy Policy; United Kingdom - Privacy Policy.

## Registration and authentication provided directly by EMSA

By registering or authenticating, Users allow EMSA to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

## **Direct registration (EMSA)**

The User registers by filling out the registration form and providing the Personal Data directly to EMSA.

Personal Data processed: academic background; billing address; budget; city; company name; country; country; date of birth; email address; fax number; field of activity; first name; gender; house number; language; last name; number of employees; password; phone number; physical address; picture; prefix; profession; profile picture; Social Security number (SSN); state; Tax ID; Tracker; Twitter handle; Usage Data; User ID; username; various types of Data; VAT Number; website; workplace; ZIP/Postal code.

#### **Social features**

#### Public profile (EMSA)

Users may have public profiles that other Users can display. In addition to the Personal Data provided, this profile may contain Users' interactions with EMSA.

Personal Data processed: city; company name; country; county; date of birth; email address; first name; gender; geographic position; last name; phone number; physical address; picture; profession; state; username.

## **SPAM** protection

This type of service analyzes the traffic of EMSA, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

## Google reCAPTCHA

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Tracker; Usage Data.

Place of processing: United States; Ireland.

## Traffic optimization and distribution

This type of service allows EMSA to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between EMSA and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

## Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through EMSA, i.e., communication between EMSA and the User's browser, while also allowing analytical data from EMSA to be collected.

Personal Data processed: Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy.

## Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

## Further information about the processing of Personal Data

#### **Preference Cookies**

Preference Cookies store the User preferences detected on EMSA in the local domain such as, for example, their timezone and region.

## Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by EMSA depends on the payment system used.

## Global TCF v2 Cookie (euconsent-v2)

Global TCF v2 Cookie (euconsent-v2) stores User advertising tracking preferences under the .consensu.org domain. When a Global TCF v2 Cookie (euconsent-v2) is set by the iubenda Cookie Solution, also a local 'cache' Cookie is stored in the local

domain.

## iubenda Cookie Solution (consent Cookie)

iubenda consent Cookie (\_iub\_cs-X) is set by the iubenda Cookie Solution and stores User preferences related to Trackers in the local domain.

## Site specific TCF v2 Cookie (euconsent-v2)

Site specific TCF v2 Cookie (euconsent-v2) stores User advertising tracking preferences in the local domain.

## localStorage

localStorage allows EMSA to store and access data right in the User's browser with no expiration date.

## **Browser Fingerprinting**

Browser Fingerprinting creates an identifier based on a device's unique combination of characteristics (e.g. IP address, HTTP header, browser properties etc.), that allows to distinguish the User from other Users, thereby enabling to track the User's browsing behavior across the web. Browser Fingerprinting does not have an expiration date and cannot be deleted.

## **Cookie Policy**

EMSA uses Trackers. To learn more, Users may consult the Cookie Policy.

## **Further Information for Users**

## Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill
  such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the
  relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

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

## The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

#### Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

#### How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## Additional information about Data collection and processing

## Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of EMSA or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

## Additional information about User's Personal Data

In addition to the information contained in this privacy policy, EMSA may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

## System logs and maintenance

For operation and maintenance purposes, EMSA and any third-party services may collect files that record interaction with EMSA (System logs) or use other Personal Data (such as the IP Address) for this purpose.

## Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within EMSA and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

#### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Usage Data**

Information collected automatically through EMSA (or third-party services employed in EMSA), which can include: the IP addresses or domain names of the computers utilized by the Users who use EMSA, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using EMSA who, unless otherwise specified, coincides with the Data Subject.

#### **Data Subject**

The natural person to whom the Personal Data refers.

## **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described 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, including the security measures concerning the operation and use of EMSA. The Data Controller, unless otherwise specified, is the Owner of EMSA.

## **EMSA (or this Application)**

The means by which the Personal Data of the User is collected and processed.

#### Service

The service provided by EMSA as described in the relative terms (if available) and on this site/application.

### European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

### Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

## Legal information

This privacy policy relates solely to EMSA, if not stated otherwise within this document.

Latest update: October 27, 2022