# Privacy Policy of Nu Yu Medi Spa SAL

Nu Yu Medi Spa SAL collects some Personal Data from its Users.

## **Owner and Data Controller**

Nada Soueidan Nu Yu Medi Spa SAL Address:

Lebanon: VERDUN BLDG VERDUN PLAZA 1 ST FLOOR Qatar-Doha- Khalid Bin Obada Street-Al Markhiya - Villa #18

Owner contact email: clinic@nuyumedispa.com

## **Types of Data collected**

Among the types of Personal Data that Nu Yu Medi Spa SAL collects, by itself or through third parties, there are: Trackers; first name; last name; gender; date of birth; phone number; VAT Number; company name; profession; physical address; fax number; country; state; county; email address; ZIP/Postal code; various types of Data; city; Tax ID; field of activity; User ID; number of employees; website; Usage Data; number of Users; device information; session statistics; latitude (of city); browser information; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; marital status; Data communicated while using the service; username.

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 Nu Yu Medi Spa SAL.

Unless specified otherwise, all Data requested by Nu Yu Medi Spa SAL is mandatory and failure to provide this Data may make it impossible for Nu Yu Medi Spa SAL to provide its services. In cases where Nu Yu Medi Spa SAL 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 Nu Yu Medi Spa SAL or by the owners of third-party services used by Nu Yu Medi Spa SAL 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 Nu Yu Medi Spa SAL.

## Mode and place of processing the Data

## Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organisational 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 Nu Yu Medi Spa SAL (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**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

## 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: Traffic optimisation and distribution, Contacting the User, Remarketing and behavioural targeting, Analytics, Advertising, Displaying content from external platforms, Content performance and features testing (A/B testing), SPAM protection, Tag Management, Interaction with external social networks and platforms, Managing data collection and online surveys and Access to third-party accounts.

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 Nu Yu Medi Spa SAL 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 authorisation by the User.

#### Twitter account access (X Corp.)

This service allows Nu Yu Medi Spa SAL to connect with the User's account on the Twitter social network, provided by X Corp.

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

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

## Advertising

This type of service allows User Data to be utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Nu Yu Medi Spa SAL, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioural retargeting technique, i.e. displaying ads tailored to the User's interests and behaviour, including those detected outside Nu Yu Medi Spa SAL. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

## Google Ad Manager (Google LLC)

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with.

In order to understand Google's use of Data, consult <u>Google's partner policy</u>.

This service uses the "DoubleClick" Cookie, which tracks use of Nu Yu Medi Spa SAL and User behaviour concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

Personal Data processed: Trackers; Usage Data.

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

## $Google\ Ads\ conversion\ tracking\ (Google\ LLC)$

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on Nu Yu Medi Spa SAL.

Personal Data processed: Trackers; Usage Data.

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

## Google Ads Similar audiences (Google LLC)

Similar audiences is an advertising and behavioural targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that uses Data from Google Ads Remarketing in order to display ads to Users with similar behaviour to Users who are already on the remarketing list due to their past use of Nu Yu Medi Spa SAL. On the basis of this Data, personalised ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google <u>Ad Settings</u>.

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

Personal Data processed: Trackers; Usage Data.

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

## Google AdSense (Google LLC)

Google AdSense is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. This service uses the "DoubleClick" Cookie, which tracks use of Nu Yu Medi Spa SAL and User behaviour concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

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

Personal Data processed: Trackers; Usage Data.

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

#### LinkedIn Ads (LinkedIn Ireland Unlimited Company)

LinkedIn Ads is an advertising service provided by LinkedIn Ireland Unlimited Company or by LinkedIn Corporation, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers; Usage Data.

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

#### LinkedIn conversion tracking (LinkedIn Insight Tag) (LinkedIn Corporation)

LinkedIn conversion tracking (LinkedIn Insight Tag) is an analytics and behavioural targeting service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on Nu Yu Medi Spa SAL. The LinkedIn Insight Tag tracks conversions that can be attributed to LinkedIn ads and enables to target groups of Users on the base of their past use of Nu Yu Medi Spa SAL.

Users may opt out of behavioural targeting features through their device settings, their LinkedIn account settings or by visiting the AdChoices opt-out page.

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

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

## Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Meta Audience Network with actions performed on Nu Yu Medi Spa SAL. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

## Meta Audience Network (Meta Platforms, Inc.)

Meta Audience Network is an advertising service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, **In order to understand Meta's use of Data, consult Meta's data policy.** 

Nu Yu Medi Spa SAL may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Meta Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the <a href="Facebook ad settings">Facebook ad settings</a>.

Users may opt-out of certain Audience Network targeting through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Audience Network related sections of this privacy policy, if available.

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

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

## Meta Lookalike Audience (Meta Platforms, Inc.)

Meta Lookalike Audience is an advertising and behavioural targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that uses Data collected through Meta's Custom Audience in order to display ads to Users with similar behaviour to Users who are already in a Custom Audience list on the basis of their past use of Nu Yu Medi Spa SAL or engagement with relevant content across Meta's apps and services. On the basis of these Data, personalised ads will be shown to Users suggested by Meta Lookalike Audience.

Users can opt out of Meta's use of Trackers for ads personalisation by visiting this opt-out page.

Personal Data processed: Trackers; Usage Data.

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

#### Ortto

Ortto is a Marketing Automation tool used to send email campaigns to subscribed users and to track their behavior on the website.

Keeping track of a user's web session, and collects data on the user's first and last name, country, usage, behavior tracking, contact details, and others

## **Snap Pixel**

The Snap Pixel is a tracking code by Snap Inc. that helps Advertisers measure the cross-device impact of Campaigns. Advertisers will be able to see how many Snapchatters take action on their website(s) after seeing their Ad

## TikTok conversion tracking (TikTok Inc.)

TikTok conversion tracking is an analytics and behavioural targeting service provided by TikTok Inc., TikTok Information Technologies UK Limited , Bytedance, TikTok Technology Limited or by TikTok Pte. Ltd., depending on how the Owner manages the Data processing, that connects data from the TikTok advertising network with actions performed on Nu Yu Medi Spa SAL. The TikTok pixel tracks conversions that can be attributed to TikTok ads and enables to target groups of Users on the base of their past use of Nu Yu Medi Spa SAL.

Personal Data processed: device information; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

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

## X Ads conversion tracking (X Corp.)

X Ads conversion tracking is an analytics service provided by X Corp. that connects data from the X advertising network with actions performed on Nu Yu Medi Spa SAL.

Personal Data processed: Trackers; Usage Data.

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

## **Analytics**

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

#### FullStory (FullStory, Inc.)

FullStory is an analytics and heat mapping service provided by FullStory, Inc.

FullStory maps how frequently Users interact with the different areas of Nu Yu Medi Spa SAL, allowing the Owner to draw conclusions about their interests and preferences. FullStory further allows for the recording of mapping sessions making them available for later visual playback.

Personal Data processed: Trackers; Usage Data.

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

#### Google Analytics (Universal Analytics) (Google LLC)

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 utilises the Data collected to track and examine the use of Nu Yu Medi Spa SAL, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

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

Personal Data processed: Trackers; Usage Data.

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

## Google Analytics 4 (Google LLC)

Google Analytics 4 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 Nu Yu Medi Spa SAL, 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 Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting <u>Google's official documentation</u>.

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

Personal Data processed: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data.

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

#### Google Analytics Advertising Reporting Features (Google LLC)

Google Analytics on Nu Yu Medi Spa SAL has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyse specific behaviour and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

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

#### Google Analytics Demographics and Interests reports (Google LLC)

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for Nu Yu Medi Spa SAL (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

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

#### **Meta Events Manager (Meta Platforms Ireland Limited)**

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited or by Meta Platforms, Inc., depending on how the Owner manages the Data processing. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on Nu Yu Medi Spa SAL.

Personal Data processed: Trackers; Usage Data.

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

## **Contacting the User**

#### Contact form (Nu Yu Medi Spa SAL)

By filling in the contact form with their Data, the User authorises Nu Yu Medi Spa SAL 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; Trackers; Usage Data; User ID; various types of Data; VAT Number; website; ZIP/Postal code.

## Mailing list or newsletter (Nu Yu Medi Spa SAL)

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 Nu Yu Medi Spa SAL. Your email address might also be added to this list as a result of signing up to Nu Yu Medi Spa SAL or after making a purchase.

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

## Content performance and features testing (A/B testing)

The services contained in this section allow the Owner to track and analyse the User response concerning web traffic or behaviour regarding changes to the structure, text or any other component of Nu Yu Medi Spa SAL.

#### Google Optimize (Google LLC)

Google Optimize is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

Google may use Personal Data to contextualise and personalise the ads of its own advertising network.

Personal Data processed: Trackers; Usage Data.

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

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of Nu Yu Medi Spa SAL 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.

## Google Fonts (Google LLC)

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

Personal Data processed: Trackers; Usage Data.

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

#### Wistia widget (Wistia, Inc.)

Wistia is a video content visualisation service provided by Wistia, Inc. that allows Nu Yu Medi Spa SAL to incorporate content of this kind on its pages.

Personal Data processed: Trackers; 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 Nu Yu Medi Spa SAL.

The interaction and information obtained through Nu Yu Medi Spa SAL 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 Nu Yu Medi Spa SAL isn't being connected back to the User's profile.

#### 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: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

#### 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 X Corp.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States - Privacy Policy.

## Managing data collection and online surveys

This type of service allows Nu Yu Medi Spa SAL to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

#### Meta lead ads (Meta Platforms, Inc.)

Meta lead ads is an advertising and data collection service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that allows form-based ads to be shown to Users prepopulated with Personal Data from their Facebook profiles, such as names and email addresses. Depending on the type of advertisement, Users may be requested to provide further information.

Form submission results in the collection and processing of these Data by the Owner under this privacy policy, and only for the specific purpose outlined on the form and/or inside this privacy policy, where provided.

Users may exercise their rights, at any time, including the right to withdraw their consent to the processing of their Data, as specified in the section containing information about User rights in this privacy policy.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; email address; first name; gender; last name; marital status; phone number; physical address; profession; state; Trackers; Usage Data; ZIP/Postal code.

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

#### Remarketing and behavioural targeting

This type of service allows Nu Yu Medi Spa SAL and its partners to inform, optimise and serve advertising based on past use of Nu Yu Medi Spa SAL by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioural targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

## Facebook Remarketing (Meta Platforms, Inc.)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Nu Yu Medi Spa SAL with the Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

#### Google Ad Manager Audience Extension (Google LLC)

Google Ad Manager Audience Extension is a remarketing and behavioural targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that tracks the visitors of Nu Yu Medi Spa SAL and allows selected advertising partners to display targeted ads across the web to them.

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

Personal Data processed: Trackers; Usage Data.

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

#### Google Ads Remarketing (Google LLC)

Google Ads Remarketing is a remarketing and behavioural targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Nu Yu Medi Spa SAL with the Google Ads advertising network and the DoubleClick Cookie.

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

Users can opt out of Google's use of Trackers for ads personalisation by visiting Google's Ads Settings.

Personal Data processed: Trackers; Usage Data.

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

## Google Signals (Google LLC)

Nu Yu Medi Spa SAL uses Google Signals, a feature of Google Analytics, which will associate the visitation information that it collects from Nu Yu Medi Spa SAL with Google information from accounts of signed-in Google-account users who have consented to this association for the purpose of ads personalisation. This Google information may include User location, search history, YouTube history and Data from sites that partner with Google – and is used to provide aggregated and anonymised insights into Users' cross device behaviours.

If a User falls under the described association, they may access and/or delete such Data via My Activity provided by Google.

Personal Data processed: Trackers; Usage Data.

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

#### LinkedIn Website Retargeting (LinkedIn Corporation)

LinkedIn Website Retargeting is a remarketing and behavioural targeting service provided by LinkedIn Corporation that connects the activity of Nu Yu Medi Spa SAL with the LinkedIn advertising network.

Personal Data processed: Trackers; Usage Data.

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

## Meta Custom Audience (Meta Platforms, Inc.)

Meta Custom Audience is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Nu Yu Medi Spa SAL with the Meta Audience Network.

Users can opt out of Meta's use of Trackers for ads personalisation by visiting this opt-out page.

Personal Data processed: email address; Trackers.

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

#### TikTok Remarketing (TikTok Information Technologies UK Limited)

TikTok Remarketing is a remarketing and behavioural targeting service provided by TikTok Information Technologies UK Limited , TikTok Inc., Bytedance, TikTok Technology Limited or by TikTok Pte. Ltd., depending on how the Owner manages the Data processing, that connects the activity of Nu Yu Medi Spa SAL with the TikTok advertising network.

Personal Data processed: device information; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

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

### Twitter Remarketing (X Corp.)

Twitter Remarketing is a remarketing and behavioural targeting service provided by X Corp. that connects the activity of Nu Yu Medi Spa SAL with the Twitter advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

#### Twitter Tailored Audiences (X Corp.)

Twitter Tailored Audiences is a remarketing and behavioural targeting service provided by X Corp. that connects the activity of Nu Yu Medi Spa SAL with the Twitter advertising network.

Users can opt out from interest-based ads by going to: Personalization and Data.

Personal Data processed: email address; Trackers.

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

## **SPAM** protection

This type of service analyses the traffic of Nu Yu Medi Spa SAL, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognised as SPAM.

## Google reCAPTCHA (Google LLC)

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 <u>privacy policy</u> and <u>terms of use</u>.

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; Trackers; Usage Data.

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

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on Nu Yu Medi Spa SAL in a centralised fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

#### Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers; Usage Data.

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

## **Traffic optimisation and distribution**

This type of service allows Nu Yu Medi Spa SAL to distribute their content using servers located across different countries and to optimise 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 Nu Yu Medi Spa SAL 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 optimisation and distribution service provided by Cloudflare Inc.

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

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

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

## 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.

## **Cookie Policy**

Nu Yu Medi Spa SAL uses Trackers. To learn more, Users may consult the **Cookie Policy**.

## **Further Information for Users in the European Union**

This section applies to all Users in the European Union, according to the General Data Protection Regulation (the "GDPR"), and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy. Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the Personal Data, if any, and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document**.

## 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

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

#### 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 of Data transfers to a country outside the European Union or to any international organisation 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.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

## 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 Nu Yu Medi Spa SAL 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, Nu Yu Medi Spa SAL 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, Nu Yu Medi Spa SAL and any third-party services may collect files that record interaction with Nu Yu Medi Spa SAL (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 Nu Yu Medi Spa SAL 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 Nu Yu Medi Spa SAL (or third-party services employed in Nu Yu Medi Spa SAL), which can include: the IP addresses or domain names of the computers utilised by the Users who use Nu Yu Medi Spa SAL, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised 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 Nu Yu Medi Spa SAL 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 Nu Yu Medi Spa SAL. The Data Controller, unless otherwise specified, is the Owner of Nu Yu Medi Spa SAL.

## Nu Yu Medi Spa SAL (or this Application)

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

## Service

The service provided by Nu Yu Medi Spa SAL 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 Nu Yu Medi Spa SAL, if not stated otherwise within this document.

Latest update: 27 November 2025