

# Privacy Policy Information for [masteringdentistry.dental](http://masteringdentistry.dental)

*Articles 13-14 of EU Reg. 2016/679*

Privacy policy information is a general obligation that must be fulfilled before or at the latest when you start collecting personal data directly. If personal data are not collected directly from the person concerned, the information must be provided within a reasonable period, or when you communicate the data (to third parties or the person concerned), not when you record the data. In accordance with the General Regulation for the Protection of Personal Data of Individuals (GDPR - Reg. (EU) 2016/679), the undersigned organization as Data Controller informs you of the following:

## **SOURCES AND CATEGORIES OF PERSONAL DATA**

Personal data held by the undersigned organisation are collected directly from the interested parties. This site does not collect sensitive data, which is intended to reveal the racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of trade unions, associations or organizations of a religious, philosophical, political or trade union, health and sex life.

### Navigation data

During their normal operation, the computer systems and software procedures of the website acquire some personal data. The transmission of this data is implicit in the use of Internet communication protocols. The site does not collect this information to associate it with identified interested parties; however, by their very nature, the information could allow users to be identified through processing and association with data held by third parties. This category of data includes: IP addresses or domain names of computers (used by users connecting to the site), URI (Uniform Resource Identifier) of requested resources, time of request, method used to submit request to the server, size of the file obtained in response, the numerical code indicating the status of response from server (successful, error, etc..) and other parameters relating to the operating system and computer environment of user. The website uses these data only to obtain anonymous statistical information on the use of the site and to check its proper functioning and are deleted immediately after processing. Data could be used to determine responsibility in case of hypothetical computer crimes against the website.

### Profiling Data

The site does not directly acquire profiling data regarding the consumption habits or choices of the person concerned. However, it is possible that such information may be acquired by independent or distinct subjects through links or by incorporating elements of third parties. See the section on third-party cookies.

### Cookies

Like others, this website stores cookies on the user's browser in order to transmit personal information and to enhance his experience. In fact, cookies are small text strings. Websites visited by the user send them to the user's terminal (usually the browser), where they are stored, sometimes with characteristics of wide temporal persistence, and then sent back to the same sites on next visit.

As explained below, you can choose whether and which cookies to accept, bearing in mind that refusing to use them may affect your ability to perform certain transactions on the site or the accuracy and adequacy of some customizable content offered or the ability to recognize you from one visit to the next. If you do not make any choice, the site applies the default settings and it will activate all cookies: however, at any time, you can communicate or change your decision.

### Technical Cookies

This website uses so-called session cookies; these cookies are not permanently stored on user's computer and disappear when browser is closed. Their use is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server); these cookies allow safe and efficient exploration of the website and avoid the use of other computer techniques potentially prejudicial to the confidentiality of users' navigation. They do not allow the acquisition of personal identification data of the user. Furthermore website uses analytics cookies that help to understand how visitors interact with the site content, collecting information (geographical and web origin, technology used, language, entry pages, visited, exit pages, average time, etc.)

and generating usage statistics of the website without personal identification of individual visitors. All these cookies are technical cookies. Since it is not necessary to give consent, the opt-out mechanism applies. This site does not communicate technical cookies to third parties, as they are necessary or useful for the functioning of the site; therefore, only persons qualified as persons in charge, data processors or system administrators treat them.

### Third-Party Cookies

Finally, website incorporates cookies and other elements (tags, pixels, etc.) of third parties (independent and on which the Owner has no responsibility) that also perform profiling activities. For these activities you can consult respective websites:

- [Google Analytics](#)
- [Google](#) (widget)
- [YouTube](#) (widget)
- [Facebook](#) (widget)
- [AddThis](#) (widget)
- [AddToAny](#) (widget)
- [GetClicky](#) (web statistics tool)

### Data provided voluntarily by the user

Optional, explicit and voluntary sending of electronic mail to the addresses indicated on the site involves the subsequent acquisition of the sender's address, needed to respond to requests, as well as any other personal data included in the email. In addition, the explicit and voluntary sending of forms that can be filled in on the site containing data of interested party involves treatment to follow up the pre-contractual obligations or the services' execution foreseen with the sending of the forms. Such information may concern personal data, contact details, telephone numbers, email addresses of interested parties and third parties identified and identifiable as having cause with the website's user. However, specific summary information will be progressively reported or displayed in website pages, prepared for particular services on request.

### Newsletter and Mailing-list

E-mail contacts used to send communications from the site come from voluntary registrations by the recipient who is always subject to a request for confirmation, as well as information acquired in the context of the sale of products or services of the Owner or otherwise similar. This includes the sending of information, promotional communications and material. Please note that contacts are not acquired by public subscriber lists. If the recipient is not interested in the communication can avoid any further contact, by clicking on the link contained in each message, or by writing to the contact details at the bottom exercising their right to unsubscribe from the newsletter. MailUp could be used, which is a service for managing addresses and sending e-mail messages provided by MailUp S.p.A. Personal data collected: email, name and surname, city, mobile phone (optional). Place of processing: Italy ([privacy policy](#))

### Payments

Payment system includes the communication of certain data to the bank providing the service (Paypal, Banca Sella, etc.). Requested data are freely provided by the interested party: some of them (Name, Surname, E-mail) are mandatory; others are optional (notes, reason, etc.).

### E-commerce

Data processed for the management of carts, orders, any profile of the registered user and include personal data, addresses, bill of purchase, reports and notes.

Personal data provided in this section will also be processed by delegated third parties (companies for home delivery, mailing and data entry) for administrative orders' management and purchases, management of any participation in loyalty programs, processing of anonymous statistics related to the detection of purchasing behaviour, sending advertising material on products and offers through the use of any email or telephone messages.

### Private Area

All information (text, video and images) that the user uploads in his reserved area are protected by encryption and authentication systems and are accessible only to authorized users, or to those directly concerned and / or intermediaries involved. We will not disclose these information.

### **PURPOSE AND LEGAL BASIS OF TREATMENT**

Personal data are used (ref. articles 6(b) of the GDPR):

- a) to enable navigation on the site; and
- b) if necessary, to perform the service or work required as part of the normal activity carried out by the undersigned organization (code ATECO 86.23.00 Activities of dental practices).

In addition, all personal data may be processed:

- c) for purposes connected with obligations provided for by law, as well as by provisions issued by authorities empowered to do so by law (ref. articles 6(c) and 9(b,g,h) of the GDPR);
- d) for the establishment, exercise or defence of a judicial and extrajudicial right (legitimate interest) of the undersigned organisation (ref. articles 6(f) and 9(f) of the GDPR);
- e) for direct marketing purposes in accordance with the legitimate interests of the Data Controller; for cookies, the advertising id used to display advertising and announcements; for e-mail addresses used to send the newsletter; for navigation and use logs used to protect the site and service from cyber attacks; in these cases, the data subject may always refuse consent so that the Data Controller will refrain from processing (ref. articles 6(f) of the GDPR);
- f) for purposes related to the activity for which the interested party has the right to express consent or not, such as, for example, subscription to the newsletter to receive information messages and promotion and sale of products and services, detection of the degree of satisfaction, communication of data to third parties to receive information and promotional communications and marketing (GDPR art.6(a))

**REFUSAL TO  
PROVIDE DATA  
AND  
CONSEQUENCES**

Communication of the data is optional but indispensable for the processing of the same for the purposes of letters a) and b). If the interested party does not communicate its essential data and do not allow the treatment it will not be possible to proceed to the completion and implementation of the services proposed and follow up the contractual obligations undertaken, with consequent prejudice to the proper fulfilment of regulatory obligations, such as for example accounting, tax and administrative, etc.

*The user can provide personal data for cookies and specific requests through forms, e.g. on products and/or services, except as specified for navigation data. If the user does not provide this information, it may be impossible to obtain what has been requested.* For all non-essential data, including sensitive data, the provision is optional. In the absence of consent or incomplete or incorrect provision of certain data, including sensitive data, the requirements may be so incomplete as to cause prejudice. This prejudice is in terms of sanctions or loss of benefits, both for the impossibility of guaranteeing the adequacy of the processing itself to the obligations for which it is carried out, and for the possible mismatch between the results of the processing itself and the obligations imposed by the law to which it is addressed. The undersigned organization is exonerated from any and all responsibility for any sanctions or afflictive measures.

**DATA  
PROCESSING  
METHODS**

Treatments connected to the web services of the site are carried out with automated tools for the time strictly necessary to achieve the purposes for which they were collected; they take place at servers in Italy or the EU and are only handled by technical staff in charge of processing, or by any persons in charge of maintenance and administration operations. We apply specific security measures in order to prevent loss of data, illicit or incorrect use and unauthorized access and loss of confidentiality. The property is equipped with anti-intrusion devices, firewalls, logs and disaster recovery. We use specific mechanisms to encrypt and segregate data and to authenticate and authorise users.

Processing of data means their collection, recording, organisation, storage, processing, modification, erasure and destruction or the combination of two or more of those operations. In relation to the aforementioned purposes, the processing of personal data is carried out by manual, IT and telematic tools, with logic strictly related to the purposes themselves and, in any case, in such a way as to ensure security and confidentiality. Personal data will therefore be processed in accordance with the procedures indicated in Article 5 of EU Regulation 2016/679, which provides, among other things, that data are processed lawfully and fairly, collected and recorded for specified purposes, explicit and legitimate, accurate, and if necessary updated, relevant, complete and not excessive in relation to the purposes of treatment, while respecting the rights and fundamental freedoms, as well as the dignity of the person concerned with particular reference to confidentiality and personal identity, through measures of protection and security. The undersigned organization set up the system of security, access and storage of data and will continue to improve it further.

We do not carry out an automated decision-making process (e.g. profiling).

<b>EXTRA EU TRANSFERS</b>	Treatment takes place in non-EU and extra-EEA countries, when the connections to the site come from these countries (at the request of the person who is there).
<b>DATA RETENTION PERIOD</b>	<p>Personal data will be retained, in general, for as long as the purposes of processing persist, according to the category of data processed.</p> <p>Data (only the necessary ones) are communicated</p> <ul style="list-style-type: none"> <li>• to persons in charge and data processors, both internal to the undersigned organisation and external, performing specific tasks and operations (administration of the site, analysis of navigation, traffic and profiling data, management of emails and forms sent voluntarily by the user, processing of e-commerce requests and orders, etc.)</li> <li>• in cases and to subjects required by law</li> </ul>
<b>TARGET CATEGORIES</b>	Data will not be communicated unless otherwise provided by law or after anonymisation. Except as specified for cookies and third party elements, without the prior general consent of the person concerned to the communications to third parties, it will be possible to carry out only those services that do not require such communications. If necessary, specific and punctual consents will be requested and the subjects who receive the data will use them as autonomous holders. In some cases (not object of the ordinary management of this site) the Authority may ask for news and information, in order to control the processing of personal data. In these cases the response is mandatory under penalty of administrative sanction.
<b>RIGHTS OF DATA SUBJECT</b>	At any time you may: exercise your rights against the Data Controller, pursuant to Articles 15 to 22 of the GDPR ( <a href="#">link</a> ) (access, rectification, cancellation, limitation, portability, opposition, absence of automated decision processes); complain to the Italian Data Protection Authority ( <a href="http://www.garanteprivacy.it">www.garanteprivacy.it</a> ). You may also revoke the consent given (if the processing is based on consent); taking into account that the revocation of consent does not affect the lawfulness of the processing based on consent prior to revocation.
<u>Disable cookies</u>	<p>Almost all browsers give you the possibility to manage and not enable cookies, in order to respect users' preferences. In some browsers it is possible to set rules to manage cookies site by site, an option that offers more precise control over the user's privacy; another function available on some browsers is the incognito navigation mode, so that all cookies created in this mode will be deleted after closing.</p> <p>Please refer to the following instructions for managing cookies in your browser:</p> <ul style="list-style-type: none"> <li>• <a href="#">Chrome</a></li> <li>• <a href="#">Firefox</a></li> <li>• <a href="#">Internet Explorer</a></li> <li>• <a href="#">Safari</a></li> </ul>
<b>ADDRESS AND CONTACTS</b>	<p>Data Controller is the Company <b>CLINICA ODONTOIATRICA SALZANO TIRONE S.r.l.</b>, in the person of its legal representative pro tempore.</p> <p>Head office is located in Via Cascina Colombaro, cap 12100, Cuneo (CN).</p> <p>Contacts are: phone 0171 619210; fax 0171 1890124; e-mail <a href="mailto:privacy@masteringdentistry.dental">privacy@masteringdentistry.dental</a></p> <p>A complete list of data processors is available on request.</p>

**Extract from EU Reg. N. 679/2016**  
**Article 15 Right of access of the data subject**

1. Data subject has the right to obtain from the controller confirmation as to whether or not his personal data are being processed and, if so, to obtain access to the personal data and the following information:
  - (a) purposes of the processing;
  - (b) categories of personal data concerned;
  - (c) recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
  - (d) if possible, the expected period of retention of personal data or, if this is not possible, the criteria used to determine that period;
  - (e) existence of the right of the data subject to request from the controller the rectification or erasure of personal data or the restriction of the processing of personal data concerning him or to object to their processing;
  - (f) right to lodge a complaint with a supervisory authority;
  - (g) if data are not collected from the data subject, any available information on their origin;
  - (h) the existence of an automated decision-making process, including profiling as referred to in Article 22(1) and (4), and, at least in those cases, significant information on the logic used and the anticipated importance and consequences of such processing for the data subject.
2. If personal data are transferred to a third country or an international organisation, the data subject shall have the right to be informed of the existence of appropriate safeguards within the meaning of Article 46 relating to the transfer.
3. The data controller shall provide a copy of the personal data being processed. In the event of further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. If the data subject submits the request by electronic means, and unless otherwise specified by the data subject, the information shall be provided in a commonly used electronic format.
4. The right to obtain a copy referred to in paragraph 3 shall not affect the rights and freedoms of others.

**Article 16 Right of rectification**

Data subject has the right to obtain from the controller the rectification of inaccurate personal data concerning him without undue delay. Taking into account the purposes of the processing, the data subject shall have the right to obtain the integration of incomplete personal data, including by providing an additional statement.

**Article 17 Right to erasure ("right to be forgotten")**

Data subject has the right to obtain from the controller the erasure of personal data relating to him or her without undue delay and the controller shall be obliged to erase personal data without undue delay if one of the following reasons applies:

- (a) personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - (b) data subject withdraws the consent on which the processing is based in accordance with Article 6(1)(a) or Article 9(2)(a) and if there is no other legal basis for the processing;
  - (c) data subject opposes processing pursuant to Article 21(1) and there are no overriding legitimate grounds for processing, or opposes processing pursuant to Article 21(2);
  - (d) personal data have been processed unlawfully;
  - (e) personal data must be erased in order to fulfil a legal obligation under Union or Member State law to which the controller is subject;
  - (f) personal data have been collected in relation to the provision of information society services as referred to in Article 8(1).
2. If the Data Controller made public some personal data and is obliged, in accordance with paragraph 1, to erase them, taking into account available technology and implementation costs. Data Controller shall take reasonable steps, including technical measures, to inform the data controllers processing the personal data of the data subject's request to erase any link, copy or reproduction of his personal data.
  3. Paragraphs 1 and 2 shall not apply in so far as processing is necessary:
    - (a) for the exercise of the right to freedom of expression and information;
    - (b) for the performance of a legal obligation requiring processing under Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
    - (c) for reasons of public interest in the field of public health in accordance with Article 9(2)(h) and (i) and Article 9(3);
    - (d) for the purposes of archiving in the public interest, scientific or historical research or for statistical purposes in accordance with Article 89(1), in so far as the right referred to in paragraph 1 is likely to make it impossible or seriously prejudicial to achieve the objectives of such processing; or
    - (e) for the establishment, exercise or defence of a right in judicial proceedings.

**Article 18 Right to limitation of treatment**

1. Data subject has the right to obtain from the data controller the restriction of the processing where one of the following situations occurs:
  - (a) data subject contests the accuracy of the personal data for as long as it is necessary for the controller to verify the accuracy of such personal data;
  - (b) processing is unlawful and the data subject objects to the deletion of the personal data and requests instead that their use be limited;
  - (c) although the controller no longer needs it for the purposes of processing, the personal data are necessary for the data subject to establish, exercise or defend a right in court;
  - (d) data subject objected to the processing pursuant to Article 21(1) pending verification as to whether the legitimate reasons of the controller override those of the data subject.
2. Where processing is limited in accordance with paragraph 1, such personal data shall be processed only with the consent of the data subject or for the establishment, exercise or defence of a right in court or for the protection of the rights of another natural or legal person or for reasons of substantial public interest of the Union or of a Member State, except for storage.
3. Data subject who has obtained a restriction of processing in accordance with paragraph 1 shall be informed by the data controller before such a restriction is lifted.

**Article 19 Obligation to notify in the event of rectification or erasure of personal data or restriction of processing**

The Controller shall inform each recipient to whom the personal data have been disclosed of any rectification or erasure or restriction of the processing carried out pursuant to Articles 16, 17(1) and 18, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject of such recipients if the data subject so requests.

**Article 20 Right to data portability**

1. Data subject has the right to receive in a structured, commonly used and machine-readable format personal data relating to him which are supplied to a controller and shall have the right to transmit such data to another controller without hindrance by the controller to whom he has supplied them where:
  - (a) the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) or on a contract pursuant to Article 6(1)(b); and
  - (b) processing is carried out by automated means.
2. While exercising their rights with regard to data portability pursuant to paragraph 1, the data subject shall have the right to obtain the direct transmission of personal data from one controller to another, if technically possible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. This right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.
4. The right referred to in paragraph 1 shall not affect the rights and freedoms of others.

**Article 21 Right of objection**

1. Data subject has the right to object at any time, on grounds relating to his/her particular situation, to the processing of personal data concerning him/her pursuant to Article 6(1)(e) or (f), including profiling on the basis of those provisions. The controller shall refrain from further processing personal data unless he provides evidence that there are compelling legitimate grounds for processing which take precedence over the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of a right in court.
2. If personal data are processed for direct marketing purposes, data subject shall have the right to object at any time to the processing of personal data concerning him/her carried out for such purposes, including profiling insofar as it relates to such direct marketing.
3. If the data subject objects to the processing for direct marketing purposes, the personal data shall no longer be processed for those purposes.
4. The right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information at the latest at the time of the first communication with the data subject.
5. In the context of the use of information society services and without prejudice to Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
6. If personal data are processed for the purpose of scientific or historical research or for statistical purposes in accordance with Article 89(1), data subject shall have the right, on grounds relating to his/her particular situation, to object to the processing of personal data concerning him/her, unless the processing is necessary for the performance of a task carried out in the public interest.

**Article 22 Automated decision making on natural persons, including profiling**

1. Data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or which significantly affects him or her in a similar manner.
2. Paragraph 1 shall not apply where the decision:
  - (a) is necessary for the conclusion or performance of a contract between data subject and a controller;
  - (b) is authorised by the law of the Union or of the Member State to which the controller is subject, which shall also specify appropriate measures to protect the rights, freedoms and legitimate interests of the data subject;
  - (c) is based on the explicit consent of the data subject.
3. In cases referred to in points (a) and (c) of paragraph 2, the controller shall implement appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, at least the right to obtain human intervention from the controller, to express his views and to challenge the decision.
4. Decisions referred to in paragraph 2 shall not be based on the special categories of personal data referred to in Article 9(1), unless Article 9(2)(a) or (g) applies and adequate measures are in place to protect rights, freedoms and legitimate interests of the data subject.