

Privacy Policy

Disclosure pursuant to Article 13 of European Regulation 679/2016

Introduction

In compliance with the provisions of Reg. (EU) 2016/679 (European Regulation on the protection of personal data), we are presenting you with the necessary information regarding the processing of the personal data you have provided. This disclosure does not apply to other websites that may be consulted through links available on websites of the owner, who shall not be considered in any way liable for the websites of third parties. This disclosure is provided pursuant to Article 13 of Reg. (EU) 2016/679 (European Regulation for the protection of personal data).

Audens Srl is committed to protecting the data you share with us. This privacy statement explains how Audens Srl processes information that can be used to directly or indirectly identify an individual ("Personal Data") collected through the use of its AIDme web services.

Audens Srl implements and maintains appropriate technical, security and organisational measures to protect Personal Data from unauthorised or unlawful processing and use and from accidental loss, destruction, damage, theft or disclosure.

Description of the service

AIDme is a life-saving bracelet based on NFC technology that enables the wearer to always provide medical and emergency information to rescuers in case of need or unconsciousness. AIDme works with any latest generation NFC-enabled smartphone, without any dedicated APP and it can be easily updated via the bracelet's interface. Various personal details can be stored, including blood type, allergies, intolerances, medications, personal physician's name, emergency numbers and any other information considered necessary. Joining the AIDme web-based data storage service is free of charge; the only cost is for the purchase of the life-saving bracelet. The AIDme web service available at the link <https://aidmenfc.cloud/> has the sole purpose of making available the medical data entered by the user.

Data controller

This web service is owned by Audens Srl, which is the data controller, with registered office in Via Rossini 4, 20122 Milano (MI) - Italy, VAT number 04981970280.

Data processor

The data processors are Audens Srl, who is also the data controller, with registered office in Via Rossini 4, 20122 Milano (MI) - Italy, VAT number no. 04981970280 and Kinapp Srl Via Picena snc, 62026 San Ginesio (Province of Macerata)

Data processing location

Data is processed at the Data Controller's operating offices, Audens Headquarters: Via Rossini 4, 20122 Milano (MI) - Italy and in any other place where the parties involved in data processing may be located. The processing of data collected during the use of the AIDme service and data entered by registered users in the reserved areas is also carried out at the Kinapp operational offices: Via Picena snc, 62026 San Ginesio (Province of Macerata).

Data recipients

Personal data provided may be forwarded to recipients, who will process the data in their capacities as data processors, i.e. natural persons acting under the authority of the Data Controller and the Data Processor or as independent Data Controllers, in order to fulfil contractual requirements or related purposes. Specifically, data

may be forwarded to recipients belonging to the following categories: - Subjects who provide services for the management of the information system and communication networks (including email systems).

Data protection

The system includes two separate databases, one for generic data profiling and for the storage of pseudonymized health-related data. The profiling database resides on the server of the company OVH Cloud (see terms and conditions at <https://www.ovh.it/public-cloud/>). Health-related data resides on cloud servers and is accessed via the services offered by the company Chino.io (see Chino.io terms and [conditions](#))

Storage of data on personal devices

No personal or health-related data is stored in the memory of phones or other devices used.

Data transfer

Personal data may be stored on servers located within the European Union. They may be transferred outside the European Union, always in a manner compliant the restrictions and under the conditions set forth in Articles 44 et seq. of Regulation (EU) 2016/679, in order to comply with the purposes related to the transfer itself. The interested party may obtain a copy of the conditions underlying the transfer by writing an email to informazioni@audens.net

Type of data processed and purpose

Navigation data

The computer systems and software procedures underlying AIDme operations, during their normal functionality, acquire certain personal data the transmission of which is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified data subjects, but by its very nature and through processing and association with data held by third parties, it could enable users to be identified.

This category of data includes the IP addresses or domain names of computers used by users connecting to the website, the URI (Uniform Resource Identifier) of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, failed, etc.) and other parameters associated with the operating system and the computer environment.

Such data is only used to obtain anonymous statistics related to the use of the Website and to check that it is functioning correctly; it is deleted immediately after processing. In the event of computer crimes against the website, the data could be used to ascertain responsibility.

Personal Data collected by this Application, either independently or through third parties, includes Cookies and Usage Data.

Personal Data may be freely entered by the User or collected automatically during use of the Application. Any use of cookies - or other tracking tools - by the Application or owners of third-party services used by the Application, unless otherwise stated, is aimed at identifying Users and recording their preferences for purposes strictly related to the provision of requested services.

Failure by a User to provide certain Personal Data may make it impossible for this Application to provide its services.

Users acknowledge their responsibilities for Personal Data related to third parties published or shared by the Application and warrant that they are entitled to disclose or disseminate said data, releasing the Controller from any liability to third parties.

Purpose for the processing of personal data

User and visitor data are collected to enable the Data Controller's organisation to provide its services, as well as for purposes related to statistics, to contact the user/visitor and in the event of interaction with professional rescuers. In addition, the emergency request function retrieves a user's geographic position and forwards it to specified contacts via a message.

User Data is collected exclusively to enable the application to provide its services, as well as for the purposes of Location-based interactions and Statistics.

Details regarding the processing of Personal Data

Personal Data is collected for the following purposes and by means of the following services:

Location-based interactions

Geolocation (This Application)

This Application may collect, utilise and share Data related to a User's geographic position to provide services based on the location itself.

Most browsers and devices provide default tools to deny geographic tracking and positioning. If a User has expressly authorised such options, this Application may receive information regarding the User's actual location.

Personal data collected: Geographic location.

Google Analytics (Google)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google uses the Personal Data collected to track and analyse the use of this Application, creating reports and sharing them with other services developed by Google.

Google may use Personal Data to contextualise and customise the ads on its own advertising network. Personal data collected: Cookies and Usage Data.

Data processing location: USA – Privacy Policy – Opt Out

Further information about Personal Data

Push notifications

This Application may send push notifications to the User.

Unique device identification

For statistical purposes or to store a User's preferences, this Application can track Users by saving a unique identification code assigned to their device.

[Sharing of personal data](#)

Audens srl does not share users' personal data with other companies for commercial purposes. Audens Srl shall only share such information with service providers or contractors for the purposes of providing a requested service or to analyse how visitors interact with their AIDme devices.

[Cookies](#)

Cookies are small packets of information sent by the AIDme service to the hard disk of a visitor's device.

Cookies cannot be used to run programs or send viruses to your computer. By continuing to browse AIDme, you accept the placement of cookies in your device. If you choose not to accept our cookies, we cannot assure that your experience will be as satisfactory as expected. We can also insert third-party cookies for functional purposes. The use of cookies is widespread and of benefit to AIDme visitors. For more information, please consult <http://www.aidmenfc.it/informativa-privacy/>

[Links to other services](#)

Please be aware that when browsing in our website, visitors may access links to other external sites beyond our sphere of influence. Audens Srl is therefore not responsible for the content or the privacy policies of these other sites.

[Third-party services](#)

AIDme may use Google Analytics, an analysis service provided by Google Inc. ("Google"), in order to improve its usability and communication with users, estimate the degree of user internationalisation, promote institutional activities and customize and analyse the various types of users.

For more information on the Google Inc. Privacy Policy, please see <http://www.google.it/analytics/terms/it.html>

AIDme may use Servers hosted by Cloud OVH. For more information on the Privacy Policy, please see <https://www.ovh.it/public-cloud/>

AIDme may use Cloud-based Server services hosted by "[Chino.io](https://www.chino.io/)". For more information on the Privacy Policy please see <https://www.chino.io/>

[Retention period. Retention and deletion](#)

Data collected will be stored for a period not exceeding that required for the achievement of relevant processing purposes or for terms compliant with applicable legal provisions.

Audens Srl will not store data for longer than necessary to fulfil the purposes for which it was collected or as required by applicable laws or regulations. As for the website reserved areas, on conclusion of the envisaged stand-by period following the closure or expiry of a user's account, all personal data collected via AIDme devices will be deleted, as required by applicable law.

[Data processing Methods](#)

Processing may be implemented by means of manual and/or IT instruments, with organisational and processing methods strictly related to the applicable purposes and in all cases according to the requirements to ensure the security, integrity and confidentiality of the data in compliance with the organisational, physical and logical measures envisaged by the prevailing regulations. Audens Srl adopts specific security measures to prevent the loss of data, its illicit or incorrect use and unauthorised access.

In addition to the Data Controller, in certain cases other corporate functions involved in website operations may have access to stored personal data (administration, sales, legal department, system administrators) or external parties (such as third-party technical service providers, hosting providers, IT companies).

[Legal Basis for Processing Personal Data](#)

Personal data submitted will be processed in compliance with the lawfulness requirements pursuant to Article 6 Reg. (EU) 2016/679 for the following purposes:

- possible registration on the website and access to website restricted areas to use the features offered by the contract platform (Article 6 paragraph 1 point (b)) as the legal basis of the processing.

The legal basis for the processing of your data is your consent, which is mandatory to continue using the Aidme service. In compliance with the restrictions applicable to the aforementioned processing purposes, your data may be disclosed to partners, consultancy companies and private companies, duly appointed as Data Processors by the Data Controller, for purposes of legal compliance or in order to fulfil your specific requests.

[Security of the Service, Data Encryption and Access to Data.](#)

Communications between clients and servers adopt the "https" protocol (encrypted connectivity using asymmetric cryptography). Health-related data is stored on encrypted servers.

Rights of data subjects

At any time, Users or visitors may exercise their rights: to access their personal data; to obtain the rectification or cancellation of their personal data or the restriction of its processing scope; to oppose the processing of their personal data or its portability; to revoke their consent where envisaged (the withdrawal of consent does not prejudice the lawfulness of processing based on consent given prior to the revocation); to submit a complaint to the supervisory authority (Privacy Guarantor).

Your rights can be exercised by sending a request to:

- by email to informazioni@audens.net
- or by post to Audens Srl, Via Rossini 4, 20122 Milano (MI) - Italy

Defence and abuse in relation to the use of AIDme.

Audens Srl may use the personal data of visitors or users in court or in preparatory proceedings for its defence against abuse in the use of these AIDme devices or related services by users or visitors. Finally, public authorities may request such data from the Data Controller, who will be obliged to submit them to the competent authorities.

Acceptance of the privacy policy

We reserve the right to amend our privacy policy as required. Continued use of AIDme subsequent to the disclosure of such amendments implies acceptance of the revised privacy policy. Users who object to any of the changes to the Policy must stop using these AIDme devices and may request the Data Controller to remove their personal data. If you have any doubts about this privacy policy or how Audens Srl manages your data, please send us an email to informazioni@audens.net

Additional information. Information not contained in this policy

This privacy policy is strictly related to this web service only. More information concerning the processing of Personal Data may be requested at any time from the Data Controller by using the contact information or, if you have further questions about data collected by Audens Srl or about how we use it, do not hesitate to contact us by email at informazioni@audens.tech

For questions concerning privacy and data protection, you can contact us at the following address:

informazioni@audens.net
Via Rossini 4, 20122 Milano (MI) - Italy

Definitions and legal references

Data Controller (or Controller)

The natural person, legal person, public administration or any other body, association or organisation with the right, also jointly with another Data Controller, to make decisions regarding the purposes and methods related to the processing of personal data and the means adopted, including the relevant security measures, concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the licensee of this Application.

Data Processor (or Processor)

The natural person, legal person, public administration or any other body, association or organisation responsible, also jointly with another Data Controller, to make decisions regarding the purposes and methods related to the processing of personal data and the means adopted, including the relevant security measures, concerning the operation and use of this web service.

Personal data

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person (C26, C27, C30 Reg. (EU) 2016/679)

The AIdme web service

The web tool through which the Personal Data of Users are collected.

Cookies

A small packet of data stored within the User's device.

Server

In information technology, a server is a component or subsystem dedicated to information processing and traffic management that provides, at a logical and physical level, any type of service to other components (typically referred to as clients) that may request such as service via a computer network, within a computer system or directly on a local computer.

Information about this privacy policy

The Data Controller is responsible for this privacy policy stored on its servers.

Legal references

This privacy disclosure has been prepared in fulfilment of the obligations set forth in Regulation (EU) 2016/679.