

The company Optimens s.r.l. sb (VAT 01363630326), with its registered office in Trieste (TS), 64 Enrico Fonda Street, Zip Code 34149, as the data controller (hereinafter the "Data Controller") of the website <https://optimens.it/> (hereinafter the "Site"), informs the users of the Site (hereinafter the "Data Subjects") pursuant to Article 13 of the European Regulation No. 2016/679, the General Data Protection Regulation (GDPR).

The Data Controller is aware of the importance of processing the personal data of the Data Subjects and, for this reason, takes care to indicate which data are processed and how they are processed. By browsing the Site or indicating their willingness to use the services provided by the same, the Data Subject declares to have read and accepted this information notice (hereinafter "Notice"), thus giving consent for the processing of personal data by the Data Controller.

For any information, questions, or requests regarding this Notice, the Data Controller makes the following email address available to the Data Subjects:

- optimenssrl@gmail.com

What are the rights of the Data Subject concerning the processing of personal data?

The Data Subject has the following rights:

- Right to be informed about the processing of data concerning them and, if applicable, access the processed personal data;
- Right to rectify personal data;
- Right to the erasure (right to be forgotten) of personal data concerning them;
- Right to restrict the processing of personal data concerning them;
- Right to data portability to receive or have transmitted to another Data Controller the personal data concerning them in a structured, commonly used, and machine-readable format;
- Right to object to the processing of personal data;
- Right to withdraw the previously given consent;
- Right to lodge a complaint with the competent authorities for violations of personal data processing.

How to exercise the rights?

The Data Subject can exercise their rights by writing to the email address indicated above. The Data Controller does not intend to charge the Data Subjects to exercise their rights, but for this purpose, the Data Controller may request specific information to follow up on the Data Subject's communications regarding their rights. The mentioned communications are usually answered within 30 days of receiving the communication itself, but if this deadline cannot be met (e.g., due to an excessive load of requests or the complexity of the response), the Data Controller will inform the Data Subject and keep them updated on the developments of the communication sent.

What personal data are processed?

The Data Controller processes the personal data provided by the Data Subject or by third parties to follow up on the Data Subject's contact requests received through the Site (hereinafter the "**Services**").

a. *Data provided directly by the Data Subject:*

Category of personal data	Types of data
Identification and contact data	Name, surname, residence/domicile, email address, phone number
Special data	Genetic data, biometric data, data relating to the psychological and physical health of users, health data
Technical data	IP address

b. *Data collected from third parties:*

Third-party source of personal data	Types of data
External providers	<ul style="list-style-type: none"> • Behavioral data • Technical data • Special data

Aggregated Data

The Data Controller may collect, use, and share aggregated data, such as statistical or demographic data, for any purpose. Aggregated data may derive from the Data Subject's personal data, but once aggregated, it does not constitute personal data under the GDPR as it cannot directly or indirectly identify the Data Subject. However, if the Data Controller combines or connects aggregated data with the Data Subject's personal data in a way that allows for the identification of the Data Subject, the Data Controller will treat the resulting data according to this Notice.

Special Data

The Data Controller processes various categories of special data of the Data Subject (special data includes information related to racial or ethnic origin, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, genetic, biometric, and health data), specifically treating data related to the psychological and physical health of its users, genetic and biometric data, and health data. The Data Controller is committed to handling special data with absolute confidentiality and ensuring the highest integrity and availability of such data by implementing all appropriate technical and organizational security measures.

Why are personal data processed?

The Data Controller processes personal data for the purposes indicated in the following table. The GDPR requires that for each purpose of personal data processing, the Data Controller must have a legal basis for processing. The Data Controller may process the Data Subject's personal data using consent as the legal basis for processing. Consent can be revoked at any time, but processing carried out before the revocation of consent will not be affected. Below is a summary table of purposes and their descriptions:

Purpose	Description	Retention
Provide the Services	The platform will provide an AI algorithm capable of evaluating and monitoring the data provided by users to prepare cognitive training paths and additional services as described on the Site. The Data Controller may manage the personal and special data of users in relation to third parties (such as accredited institutions and entities) to improve the quality of its paths and enhance the services offered.	Data will be retained until the provision of the individual Services is completed and for the subsequent 12 months after their provision.
Request and receive information	The Data Subject can request to be contacted via the Site to receive information, appointments, or quantifications of activities performed by the Data Controller.	Data will be retained until the requested information is obtained.
Provide support to Data Subjects	Resolve technical issues encountered by Data Subjects during navigation, their assistance requests, improve the Services and the Site, and provide the support requested by Data Subjects.	Data will be retained until the support request is fulfilled.
Newsletter	The Data Controller may send updates, not of a commercial nature, to inform the Data Subject about developments in its activity, such as agreements with commercial partners and participation in events.	Data will be retained for 24 months.
Marketing	The Data Controller may send updates, of a commercial nature, to inform the Data Subject about any promotions, discounts, and economic advantages of its activity.	Data will be retained for 12 months.
Comply with legal, regulatory, and protection obligations	The Data Controller may process the Data Subject's personal data to comply with legislative and regulatory obligations, such as complying with orders from judicial and administrative authorities. The Data Controller may also process data to protect its rights and interests, for example, in case of judicial protection or due diligence in case of changes in corporate structure.	Personal data will be retained for the period determined by law, regulation, and/or the competent authority.

What happens if the Data Subject does not provide the necessary personal data?

If the data are necessary to provide the Services and support the Data Subjects, the Data Controller will not be able to provide them and support the Data Subject in their requests. In this case, the Data Controller may alternatively request the integration of personal data or delete the Data Subject's personal data, preventing the provision of the Services. For purposes other than providing the Services and supporting the Data Subjects, the provision of data is optional, and the failure to provide personal data will not affect the mentioned processing purposes.

To whom are personal data communicated and disclosed?

a. *Communication.*

Personal data of the Data Subjects may be communicated to third parties relative to the Data Controller, as better indicated in the following table:

Recipients	Purpose of Communication
Providers	Providers support the Data Controller in providing the Services, such as site development, hosting, maintenance, backup, virtual infrastructure.
External partners and collaborations	Partners and external collaborations support and may support the Data Controller in improving the service offer and its quality, introducing new types of intervention, and ensuring efficient performance and results.
External consultants	In case of legal obligations or obligations related to a relationship established with the Data Subject, the Data Controller may communicate personal data to external consultants, such as accountants and lawyers.
Authorities and judicial proceedings	The Data Controller may communicate personal data to state, administrative, and/or judicial authorities if this is mandatory based on the law, regulations, or authority orders, or to defend its rights and interests.

b. *Disclosure*

Personal data of the Data Subjects will not be disclosed.

Where do we store personal data?

The Data Controller stores personal data in paper archives within the Data Controller's premises, in addition to computer archives located both within and outside the European Union if this is instrumental to the pursuit of the indicated purposes. In the latter case, the Data Controller ensures that companies not based within the European Union are processing personal data with the utmost confidentiality in compliance with European Commission adequacy decisions, Privacy Shield, or, if necessary, by stipulating agreements that ensure an adequate level of protection.

How are personal data processed?

The Data Controller processes personal data by adopting appropriate security measures to prevent unauthorized access, disclosure, modification, and destruction. Data processing is carried out through IT procedures, telematic means, and, residually, on paper by internal subjects specifically authorized as well as external managers, if appointed, also based on existing contractual agreements.

What is the data processing policy for minors?

The Data Controller is aware of the delicacy of data processing for minors. In particular, the Services are not intended to be provided to minors under 18 years of age, and the Data Controller does not voluntarily process data of minors under 18 years old. In this regard, Data Subjects are asked not to request the provision of Services if under 14 years old. The Data Controller encourages those exercising parental responsibility over minors under 18 years old to ensure that they do not request

the provision of Services and, in any case, to educate minors not to disclose their personal data through the Site. If the Data Controller becomes aware that some personal data refer to minors under 18 years old, the Data Controller will take steps to delete the personal data.

What happens if there are links to other websites?

The Data Controller informs the Data Subjects that this Notice applies only to the Site, and if there are links to other websites, the Data Subject should check the notices of those sites before providing their personal data. The Data Controller takes no responsibility for personal data provided by the Data Subjects on other websites.

Changes to the Notice

The Data Controller reserves the right to modify this Notice at any time. In case of changes, the Data Controller will upload the new notice on this page and encourages the Data Subject to check the changes to the Notice. The Data Subject can see the history of the notices by checking the date. Continuing to use the Site after the changes indicates acceptance of such changes and consent to the modified data processing.