

## Privacy Policy

Version dated January 1, 2023

### Information pursuant to Art. 13 and 14, Reg. EU 679/16 - GDPR

#### Identity and contact details of the Controller

The data Controller is CTP s.r.l, with registered office in Pavia, Via Cuzio, 42 -27100- Tax Code and VAT no. 01518550189, ph. +39 0382.22650, email [eventi@ctpeople.it](mailto:eventi@ctpeople.it) (hereafter: CTP or "the Controller") owner of the website [www.ctpeople.it](http://www.ctpeople.it) where users can register in order to use the services offered therein.

#### Nature and type of data.

The type of data collected is common (e.g. name, surname, email address) and the Controller does not collect personal data relating to persons aged under 18.

#### Source and purposes of processing

The personal data are collected directly by the Controller from the data subject when the latter completes the registration form to enrol on the relevant continuous training and lifelong learning courses in medicine ("CME"). The data may also be collected from third parties, such as companies in the industry which are interested in organising courses for their people, which may also assume the role of processor.

The data are processed for the following purposes:

- 1) performance of the contract, registration and enrolment of the data subject on the course and organisation of the training event, as well as activities instrumental to it, such as communications of any changes of programme, management fulfilments and activities aimed at accrediting the training credits, sending of medical-scientific material generated for the event;
- 2) compliance with administrative rules and other mandatory requirements by virtue of the national law in force or by virtue of decisions of the European Union, as well as communication to the competent bodies of the necessary information to ensure the data subject receives the accumulated training credits;
- 3) performance of marketing and informative activities on training courses held by the Controller;
- 4) performance of marketing and medical and scientific information on products of Recordati Group and Gedeon Richter;
- 5) establishment, exercise, or defence of a legal claim for the Controller or for third parties;
- 6) production of statistics on participation at the organised events.

#### Processing methods

The personal data are processed by the Controller using mainly electronic methods and they are stored within its company management system. Suitable security measures are applied in order to prevent the loss or alteration of data - even accidental - along with any illegal or incorrect uses and unauthorised accesses. The personal data are not disseminated and are not subject to any fully automated decision-making process, therein including profiling.

### Legal basis of processing

Based upon the processing purposes indicated in the section "Source and purposes of processing", the legal bases are the following:

- for the purposes indicated in point 1. "Source and purposes of processing", the legal basis is Art. 6, paragraph 1, letter b) of the GDPR, as the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- for the purposes indicated in point 2. "Source and purposes of processing", the legal basis is Art. 6, paragraph 1, letter c) of the GDPR, as the processing is necessary for compliance with a legal obligation to which the Controller is subject;
- for the purposes indicated in point 3 "Source and purposes of processing", the legal basis is the "*legitimate interest*" (Art. 6, paragraph 1, letter f) of the GDPR, recital C47 of the GDPR and Opinion 6/2014 of the Working Party 29, par. III.3.1.) pursued by the Controller or by a third party in protecting its rights;
- for the purposes indicated in point 4 "Source and purposes of processing" the legal basis is the consent (art. 6, paragraph 1, letter a) of GDPR;
- for the purposes indicated in point 5 "Source and purposes of processing", the legal basis is the "*legitimate interest*" (Art. 6, paragraph 1, letter f) of the GDPR, recital C47 of the GDPR and Opinion 6/2014 of the Working Party 29, par. III.3.1.) pursued by the Controller or by a third party in protecting its rights;
- for the purposes indicated in point 6 "Source and purposes of processing", the legal basis is the "*legitimate interest*" (Art. 6, paragraph 1, letter f) of the GDPR, recital C47 of the GDPR and Opinion 6/2014 of the Working Party 29, par. III.3.1.) of the Controller in assessing the priority interests of its market of reference in order to improve, supplement or modify the range of available services.

### Data collection criteria

The provision of data may be necessary for the pursuit of the purposes. The mandatory or optional nature is specified each time. The provision of data marked with an asterisk is understood to be mandatory, as, in their absence, participation at the event cannot be accepted.

The remaining data does not have to be indicated and the data subject will be able to participate at the respective training event even in their absence.

The Controller has implemented appropriate technical and organisational measures to ensure that only personal data necessary to allow the applicant to participate in the training event of interest and to optimise the organisation of that event are processed, also assessing if the applicant is entitled to receive the training credits correlated to participation at the ECM event for which the registration form was completed.



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### Processors, processing officers, autonomous controllers

- The processing officers are the employees and collaborators of the Controller, those in charge of Web services and administration, organisers of training events, marketing, information systems and data security, speakers who take part in the training events, as well as the bodies in charge of assigning training credits.
- The data may also be communicated and processed by third parties, both in the capacity of processors and of autonomous controllers such as trusted advisors of the Controller, payroll offices, medical advisors etc.
- The data may be communicated by public bodies, the judiciary or the police, if this is required by law, regulations or community legislation, which will act in the capacity of autonomous controllers.
- Data may be communicated, following the consent of the data subject, to third parties, including companies of Recordati Group and Gedeon Richter, for the purposes indicated in point 4 "Source and purposes of processing";
- Users have the right to obtain the list of any processors appointed by the Controller; to do so, the User should make a request to the Controller by following the procedures illustrated in the body of this privacy policy.

### Data storage period

Based upon the data processing purposes, the storage period determined by the Controller is the following:

- for the purposes indicated in point 1 "Source and purposes of processing", the data storage period is determined based upon the period required to provide the continuous training and lifelong learning service in medicine through the course to which the data subject has registered, in its individual phases, from course registration until accreditation of the training credits and conclusion of the formalities related to participation;
- for the purposes indicated in point 2. "Source and purposes of processing", the data storage period is determined based upon the individual national and community rules that impose legal obligations to which the Controller is subject;
- for the purposes indicated in point 3., "Source and purposes of processing", the data storage will not continue, in any case, beyond 24 months. Obviously, that storage period will be interrupted if the data subject communicates that he/she no longer wishes to receive further institutional information from the Controller; this should be communicated by following the procedures indicated in the section "Rights of the data subject in accordance with Articles 15-22 of the GDPR".

The Controller will adopt appropriate technical and organisational measures to ensure that the individual is no longer contacted;

- for the purposes indicated in point to 4., "Source and purposes of processing", the data are stored in our archives for the period required to carry out the individual phases of any judicial proceedings or disputes that may arise until they are concluded and thus for a period appropriate to the timescales reported by the competent bodies;
- for the purposes indicated in point 5., "Source and purposes of processing", the data are stored in our archives for the time taken to transform the data into anonymous form.

After that procedure, the identification data are no longer identifiable and therefore no longer subject to the GDPR requirement.

#### Place of processing and transfer of data to non-EU countries

The processing of personal data, therein including storage, occurs on servers owned by the Controller and/or by third parties instructed and duly appointed as processors, located within the European Union. There is no intention to transfer the data outside of the Union.

#### Rights of the data subjects in accordance with Articles 15-22 of the GDPR

By writing to the Controller at the postal address of Milan, Corso Sempione 44, or at the email address [eventi@ctpeople.it](mailto:eventi@ctpeople.it), the data subject may exercise the rights described below.

- request access to personal data and to information relating to the same; the rectification of inaccurate data or the supplementation of incomplete data; the erasure of personal data relating to him/her (upon the occurrence of one of the conditions indicated in Art. 17, paragraph 1 of the GDPR and in respect of the exceptions envisaged by paragraph 3 of that article); the restriction of processing of personal data (upon the occurrence of one of the circumstances indicated in Art. 18, paragraph 1 of the GDPR);
- request and obtain - in circumstances where the legal basis of processing is a contract or consent, and the processing is carried out with automated means - the personal data in a structured and machine-readable format, also to communicate those data to another controller (known as the right to data portability);
- object at any time to the processing of personal data upon the occurrence of particular situations relating to him/her;
- withdraw consent at any time, limited to circumstances where the processing is based upon consent for one or more specific purposes and with regard to common personal data (for example, date and place of birth or place of residence), or special categories of data (for example, data revealing racial origin, political opinions, religious beliefs, state of health or sex life). This is without prejudice to the lawfulness of processing based upon consent carried out prior to the withdrawal.

#### Complaint to the Supervisory Authority

The data subject has the right to lodge a complaint with the Supervisory Authority which, in Italy, is the Garante per la Protezione dei Dati Personali – Piazza Venezia 11, 00187 Rome (RM) – [www.garanteprivacy.it](http://www.garanteprivacy.it), email: [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it), using the form found at the address <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524&zx=e0yn0riezmmw>.

This privacy policy is a document that is constantly updated and the Controller reserves the right to make changes to it at any time. The changes will apply from publication on the website which we therefore invite users to consult on a regular basis.

**This privacy policy is updated to 1.1.2023**



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