

PRIVACY POLICY

(version of January 28th 2017)

HOLDERS

We undersigned (Biotechware s.r.l.) are the holders for the processing of your data and - for any need - you can write us at the following address:

Via Cardinal Massaia n. 83, 10147 Turin - Italy

You can also contact us by sending an E-mail to info@biotechware.com or using the other contact data that are available in the contact area of the website.

We wish to inform you that we will process your data in fairness and correctness, in full respect of your rights and - in particular - of their confidentiality.

DATA

We will process the following data:

Registration data- When you register, we acquire your personal data (name, surname, address, phone number, E-mail address, password, tax registration number, etc.).

Your profile's data - When you add new data to your profile, or change the existing ones, we acquire your personal data.

Medical data – When you load them, we record the data relevant to the medical diagrams (ECG or other graphical representations of the human body activities), anamnesis and the other data required to allow a physician to assess them (age, sex, etc.) referred to either you or your patients (with their respective identification and contact data);

Medical Tests – When you load them (if you are a physician, we record the data relevant to your findings;

Surfing data - When you connect to our system, the latter automatically records the information your device is sending us. The information may concern the contents loaded, the operations performed, the IP and/or MAC Address you connect from, the operating system and the language of your device, the date and time of your request and your position.

Cookies – When you use our systems, we can send one or more cookies (small text files containing a string of alphanumerical characters) to your device:

- **technical cookies** i, i.e. surfing or session cookies that are strictly required for the operation of the site or to allow you using the contents and services you requested ,
- **functionality cookies**, i.e. used to activate specific functions of the site and a set of selected criteria (e.g. the language or your preferences on the use of the cookies) in order to improve the service delivered ,
- **cookie analytics**, i.e. cookies that allow understanding how the website is utilized by the users by treating the information as aggregated anonymous form,
- **third party cookies**, i.e. cookies for websites of servers that are other than the ones hosted by this site, used with your consent, for purposes of said third parties.

Contact and communication data - When you send your contact data (E-mail, etc.) and an E-mail or another communication, we record your contact data as well as the communication.

PURPOSES

Your data will be treated for the following purposes:

- to supply you with our services (of technological support to the supply of services such as remote finding transmission, site surfing, data and finding preservation, etc.)
- to protect our services and develop new ones,
- to protect the technical operation and of our information system,
- to comply with the legal obligations and/or orders issued by public authorities, including the judicial authorities.

After making them anonymous in compliance with the law and regulations in force, the data and medical standards shall be used for the following purposes:

- develop statistical analyses and graphical representations of the use of our services,
- develop training, testing and validation of algorithms by either Biotechware or third parties,
- develop meta-analyses of the data;
- train the finding specialists through the comparison between the findings themselves;
- validate new interpretation criteria of the medical data.

We will process your data also to keep you informed on our services and on the novelties available on our site, but the adhesion to this processing purpose is optional and - should you deny such consent - we will not be allowed to pursue it and you can contact us any time to ask to interrupt it.

MODES

Your data shall be:

- collected through telematics
- registered in digital format into servers available to us.
- protected against any risk of destruction, change, deletion and unauthorized access through efficient security measures of physical, logical and organizational character.

- further treated, also in hard copy format, to the extent and within the time which is strictly required to meet the purposes above.

COMMUNICATION TO THIRD PARTIES

We will be enabled to:

- communicate the medical data to the subjects indicated by those who uploaded them or by the patient whose data are about.
- communicate every medical check to those who uploaded the medical data every check refers to.
- communicate your data to third parties who cooperate with us and treat the stage of the process required for the appropriate performance of our activities, only for the purposes indicated above, which - as reported above - shall also be appointed to such processes (and shall therefore be held liable for them),
- communicate and disseminate your data, but only in anonymous form, for the purposes reported above.
- communicate your data to third parties to comply with the legal obligations and/or orders issued by public authorities, including the judicial authorities.

NATURE AND EFFECTS OF DATA DELIVERY

The delivery of the navigation data is mandatory and indispensable to allow us deliver you the navigation service and - should you refuse to deliver them - we will not be able to deliver such service.

The delivery of the registration data and of the medical data and checks is mandatory and indispensable to allow us delivering the support service to the supply of the remote finding service and preservation of the medical data and findings and - should you refuse to deliver them - we will not be able to deliver such services.

The delivery of the data is optional but - without them - we may not be able to provide some services or some of their functionalities.

RIGHTS

We remind that the law safeguards your rights to access, update, correct the data and oppose to their processing. Such rights include -as a mere example - the right to obtain the confirmation of the existence of the data that concern you and their communication in intelligible form, their origin, the indication of their original purposes and processing modes, updating, correction or integration, deletion, transformation into anonymous form or freezing of the personal data processed in violation of the law and the right to oppose - in full or in part - to their relevant use.

INFORMATION ON THE COOKIES

You can check and/or eliminate the cookies at your convenience - for further information, refer to website <http://www.allaboutcookies.org/>.

You may select what cookies you want to authorize through the purposely-allocated procedure, which is reported hereinunder, and also delete those cookies that are already present on your devices and set the largest part of the browsers so that their application is blocked

The largest part of the browsers allows to:

- view the cookies presence and cancel them individually
- block the third party's cookies
- block the cookies coming from some websites
- block the installation of all the cookies
- delete all the cookies when closing the browser

For further information of how to set up the preferences on the use of the cookies through your navigation browser, you can consult the relevant information of the browser suppliers' website.

If you select to cancel or not to authorize the cookies, it may be impossible to use the site, view its contents and use the relevant services.

THIRD PARTY SERVICES

To process your data, we use the following services.

Google Analytics:

Web data analysis service provided by Google Inc. ("Google"), which allows analyzing the traffic on the site and uses cookies. The information generated by the cookies relevant to the use of the site - standard log information used on Internet (including IP address) and information in anonymous form on your behavior - is transmitted to Google and preserved by them on servers located in the United States. Google shall make anonymous the information transmitted by suppressing the last byte of your IP address before saving. In compliance with Google Analytics service conditions, Google shall use such information to assess your use of the website and draft reports on the site traffic on our behalf.

We will not utilize nor allow third parties to utilize the statistical analysis tools to find or collect information through which you can be identified. Google may transmit to third parties the information collected through Google Analytics because of legal obligations or where the information is processed by third parties on behalf of Google.

In compliance with Google Analytics service conditions, Google shall not associate your IP address to other relevant data they hold.

You can refuse the use of Google Analytics cookies by downloading the additional component of the browser to deactivate Google Analytics (<https://tools.google.com/dlpage/gaoptout?hl=it>). The additional component communicates with Google Analytics

JavaScript code (ga.js) to indicate the data relevant to the visit to the website must not be sent to Google Analytics. For further information, see page “Modes of use of the data by Google when sites or app's of our partners are used (<https://www.google.com/policies/privacy/partners/>), Google privacy policy (<https://support.google.com/analytics/answer/6004245?hl=it>) and Google Analytics' service terms (<https://www.google.com/analytics/terms/us.html>).