



## PRIVACY POLICY

### 1. INTRODUCTION

This Privacy Policy sets out the way in which **V.healthY** collects and processes personal data when the Data Subject uses the services of V.healthY. V.healthY takes the Data Subject's privacy very seriously and is committed to protecting the Data Subject's personal data in accordance with the General Data Protection Regulation (GDPR) and other applicable laws and regulations. In addition, V.healthY complies with the ROAM-X principles and Internet for Trust guidelines from UNESCO aligned with human rights to ensure that the Data Subject's personal data is processed in a fair, transparent, and secure manner.

### 2. GENERAL INFORMATION

**Data Controller: Eterna Global OÜ** (seat: Harju maakond, Tallinn, Kesklinna linnaosa, Tartu mnt 67/1-13b, 10115 Estonia; registration number: 16715853). The Data Controller operates the Platform ([link](#)) and responsible for processing the personal data.

**Data Subject:** shall mean the Data Controller's contractual partner's (Consultant) and the persons using the Platform (Client).

**Personal Data:** means any information relating to the Data Subject.

- 2.1. The purpose of this Privacy Policy is to supply essential information to the Data Subject about the data processing the Data Controller performs with respect to all the relevant data protection regulation.
- 2.2. The Data Controller is committed to the protection of the Data Subject's personal data and particularly wishes to observe the Data Subject's fundamental right to informational self-determination.
- 2.3. The Data Controller reserves the right to alter this Privacy Policy and commits to supply information about any such alteration in accordance with the relevant legal regulations as effective.

#### 2.4. Data Controller:

- processes the personal data lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- collects personal data for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation');
- processes personal data that are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- processes accurate and up to date data ('accuracy');
- keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation');
- processes the personal data in a manner that ensures appropriate security of the personal data ('integrity and confidentiality').

2.5. Data Controller's data processing principles are in harmony with the relevant data protection regulations as effective, including but not limited to the following:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation – “GDPR”)
- ROAM-X principles
- Internet for Trust guidelines from UNESCO aligned with human rights

2.6. This Privacy Policy is always available at the Office of the Data Controller's seat (Harju maakond, Tallinn, Kesklinna linnaosa, Tartu mnt 67/1-13b, 10115 Estonia; hereinafter: “Seat”).

2.7. Questions regarding the Privacy Policy or the Data Controller's data processing should be addressed to the DPO who can be contacted in email: [ingrid@vhealthy.fr](mailto:ingrid@vhealthy.fr)

### 3. DATA PROCESSING

3.1. The Data Controller strives to limit its personal data processing activity to what is absolutely necessary. Nonetheless, the processing of some personal data is inevitable. The Data Controller processes the personal data that the Data Subject provides, as well as all the personal data related to the Data Subject and generated during the contractual relationship between the Data Controller and the Data Subject's employer or received by the Data Controller regarding an open job position. Data Controller processes the following personal data for the purposes and on the legal basis detailed below:

#### **Client registration on the platform**

- *Purpose of the data processing:* The platform connects clients and consultants for the purpose of the consultants to provide medical services regarding mostly traditional medicine.
- *List of processed personal data:* Data provided during registration: e-mail address, password, address, phone number, area of interest;
- *Legal basis for the data processing:* Data Subject's consent. The Data Subject unequivocally and expressly declares that he or she has read the Privacy Policy and gives consent to Data Controller to process his or her personal data in connection with the service the Data Controller provides on its platform.
- *Duration of data processing:* The Data Controller is processing the Data continuously during the existence of the contract and for five years after the termination of the contract, which is necessary in order to ensure the possibility of legal enforcement in view of the general civil statute of limitations.

#### **Consultant registration on the platform**

- *Purpose of the data processing:* The platform connects clients and consultants for the purpose of the consultants to provide medical services regarding mostly traditional medicine.
- *List of processed personal data:* Name, address, ID number, certificate number, e-mail address, password, phone number, bank account details, professional credentials and licenses, bio, resume (including area of expertise, professional experience, the number of years they have been practicing in their field, educational background, professional affiliations, languages spoken, judicial record),

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- *Legal basis for the data processing:* Data Subject's consent. The Data Subject unequivocally and expressly declares that he or she has read the Privacy Policy and gives consent to Data Controller to process his or her personal data in connection with the service the Data Controller provides on its platform.
- *Duration of data processing:* The Data Controller is processing the Data continuously during the existence of the contract and for five years after the termination of the contract, which is necessary in order to ensure the possibility of legal enforcement in view of the general civil statute of limitations.

## Contact and communication

- *Purpose of the data processing:* To allow the communication between parties regardless of the consultants and clients being registered or not. If the data subject is not registered, it is also the purpose to provide an easier access to the services at a later time.
- *List of processed personal data:* Name, e-mail, phone number and written communication between the parties.
- *Legal basis for the data processing:* Data Subject's consent. The Data Subject unequivocally and expressly declares that he or she has read the Privacy Policy and gives consent to Data Controller to process his or her personal data in connection with the service the Data Controller provides on its platform.
- *Duration of data processing:* The Data Controller is processing the Data Continuously during the existence of the contract and for five years (if there is no registration) after establishing the communication.

## Direct marketing

- *Purpose of the data processing:* Presentation of the service and sending other information, news related to the service in a personalised matter.
- *List of processed personal data:* Name, contact details (email address, phone number), preferences for the type of marketing communications. Additionally, in case of consultants, professional information, area of expertise and work experience can be processed as well.
- *Legal basis for the data processing:* Data Subject's consent. The Data Subject unequivocally and expressly declares that he or she has read the Privacy Policy and gives consent to Data Controller to process his or her personal data in connection with the service the Data Controller provides on its platform.
- *Duration of data processing:* Until the data subjects withdraw their consent.

## Payment and billing

- *Purpose of the data processing:* Compliance with legal obligations.
- *List of processed personal data:* Name, address, tax ID, email address, identifier of the service, purchased price, other mandatory content elements of the invoice.
- *Legal basis for the data processing:* Legal obligation of the data controller.
- *Duration of data processing:* 8 years from the date of issue of the invoice

3.2. The Data Controller does not use automated decision-making, including profiling.

3.3. We do not transfer the Data Subject's personal data outside of the European Economic Area (EEA).

## 4. OTHER DATA PROCESSING

- 4.1. The Data Controller may occasionally perform other personal data processing. Information about any data processing not mentioned in this Privacy Policy will be supplied on the data collection.
- 4.2. The Data Subject is informed that the court, the public prosecutor, the criminal investigation authority, the infringements authority, the public administration authority, the relevant data protection authorities, as well as other authorities authorized by legal regulation may request information, data, and documents from the Data Controller, who will grant such requests to the extent it is required by the relevant legal regulations. The Data Controller will disclose personal data to the authorities only to the extent it is indispensable for the fulfilment of the authorities' meticulously detailed request for information as regards the scope and purpose of information.

## 5. DATA PROCESSORS

- 5.1. The Data Controller assigns the following data processors during its data processing activity:
  - Accountant: Ingrid Louise Mondet and its current accountant advisor namely Ms Samantha Tair
  - Online invoicing: Ingrid Louise Mondet
  - Developer: Brenin Technology private limited, cyb 1 Software technology parks of India, 342005, Jodhpur, (suyog@brenin.co)
  - Hosting services: Amazon Web Services, Inc.

## 6. PROCESSING OF THIRD PARTIES' DATA

- 6.1. If the Data Subject provides personal data from third parties, Data Subject must have the required consent or other legal basis to share the personal data with the Data Controller and informs Data Controller of any change or update relating to them. All Data Subjects should refrain from providing third parties' data unless it is necessary to comply with the contract with the Data Controller.

## 7. DATA SECURITY

- 7.1. The Data Controller treats the Data Subject's personal data confidentially, therefore Data Controller has adopted the technical and organizational measures necessary to ensure the security of personal data and avoid their accidental or unlawful destruction, loss, alteration, processing or unauthorized access, given the state of the technology, the nature of the stored data and the risks to which they are exposed, whether they come from human action or from the physical or natural environment. The Data Controller selects and operates the IT equipment used to process personal data with respect to the contractual relationship in such a way that the processed data:
  - a) is available to authorized persons (availability);
  - b) authenticity and authentication are ensured (authenticity of data processing);
  - c) integrity can be proven (integrity of data); and
  - d) is protected against unauthorized access (confidentiality of data).

## 8. RIGHTS AND REMEDIES

8.1. The Data Subject has a right to:

- **access the personal data:** Upon the Data Subject's request, the Data Controller supplies information about the Data Subject's data processed by the Data Controller as data controller and/or processed by a data processor on the Data Controller's behalf if any of the conditions stipulated in Article 15 of GDPR is fulfilled. The access can be requested here: [ingrid@vhealthy.fr](mailto:ingrid@vhealthy.fr)
- **request the rectification of the personal data:** The Data Controller rectifies the Data Subject's personal data if such data is inaccurate or incomplete while the correct personal data is available to the Data Controller.
- **request the erasure of the personal data (right to be forgotten):** The Data Controller erases any and all personal data if any of the conditions stipulated in Article 17 of GDPR is fulfilled.
- **restriction of processing:** The Data Subject obtains from the Data Controller the limitation of the data processing if any of the conditions stipulated in Article 18 of GDPR is fulfilled.
- **data portability:** The Data Subject receives the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format, if the processing is based on a consent or contract and it is carried out by automated means.

8.2. The Data Controller provides information on action taken on the Data Subject's request sent to the contract person specified in Section 2.7. without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, considering the complexity and number of the requests. The Data Controller informs the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the Data Subject makes the request by electronic means, the information will be provided by electronic means where possible, unless otherwise requested by the Data Subject. If the Data Controller does not act on the Data Subject's request, the Data Controller will inform the Data Subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

8.3. Data Subject's right to remedy:

- **filing a complaint with the authority:** Without prejudice to any other administrative or judicial remedy, Data Subject may, in the event of an infringement of his or her rights, file a complaint with the relevant data protection authorities.
- **filing a complaint with the court:** Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, Data Subjects have the right to an effective judicial remedy where he or she considers that his or her rights have been infringed as a result of the processing of his or her personal data in non-compliance with the data protection regulation. The Data Controller is liable for any loss or damage caused by the unlawful processing of the Data Subject's data or by any violation of applicable data-security requirements. The Data Controller will be exempted from such liability if the loss or damage was caused by circumstances beyond its control and outside the scope of data processing. No compensation shall be paid to the extent that the loss or damage was caused by the Data Subject's wilful or grossly negligent conduct.

## 9. COOKIES

9.1. Cookies are small text files that are placed on the Data Subject's device when visiting a website. Cookies are widely used by website owners to make their websites work, or to work more efficiently, as well as to provide reporting information. Cookies can be set by the website owner (first-party cookies) or by third-party service providers (third-party cookies). They are used to collect information about the use of our website, such as the Data Subject's preferences and browsing behavior, in order to improve the user experience.

9.2. V.healTHY uses the following types of cookies:

- **Strictly necessary cookies:** These cookies are essential for the website to function properly thus cannot be switched off. They are usually only set in response to actions made by the Data Subject which amount to a request for services, such as setting privacy preferences, logging in or filling in forms. It is possible to set the browser to block or alert the Data Subject about these cookies, but some parts of the site will not then work.
- **Performance cookies:** These cookies allow V.healTHY to count visits and traffic sources so V.healTHY can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how Data Subjects move around the site. All information these cookies collect is aggregated and therefore anonymous.
- **Functionality cookies:** These cookies enable the website to provide enhanced functionality and personalization. They may be set by V.healTHY or by third-party providers whose services we have added to our pages.
- **Advertising cookies:** These cookies may be set through our site by V.healTHY's advertising partners. They may be used by those companies to build a profile of the Data Subject's interests and show the relevant adverts on other sites. They do not store directly personal information but are based on uniquely identifying browser and internet devices. If the Data Subject does not allow these cookies, V.healTHY will experience less targeted advertising.
- **Social media cookies:** These cookies allow the Data Subject to share content from the website on social media platforms such as Facebook, Twitter, and LinkedIn. They may also track the Data Subject's activity on these platforms.

9.3. The Data Subject may reject cookies on his/her computer or on other devices used for browsing, or in the settings of the web browser (typically in Tool / Settings / Privacy / Cookies) the Data Subject is using to access the Website. Should cookies be rejected, the Data Subject will not be able to fully utilise the functionality and services of the Website, and – as a consequence – the Service Provider cannot guarantee full, smooth and uninterrupted use of the Website. More information on cookies on the [European Interactive Digital Advertising Alliance's website](#).

9.4. The first time when the Data Subject browses the website, the Data Subject sees a cookie pop up notification. The notification contains a clickable consent button. The website will not use any but the necessary cookies if the Data Subject does not give consent by clicking on the consent button.

9.5. The websites are using the following cookies:

- *Session cookies:* essential for using the functions of the Website; until the end of the session.
- *Cookies that record personal preferences* (such as screen parameters, menu settings); max 365 days.

The session cookies and the personal preference cookies are necessary cookies. All the other cookies are functional or statistical cookies.