

# Owner and Data Controller

## Types of Data collected

The owner does not provide a list of Personal Data types collected.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

## Collection of Information

We collect various types of personal information, including:

- Name
- Phone number
- Email address
- Usage Data (automatically collected when using this Application)

## Use of Collected Information

We utilize your information for purposes such as:

- Appointment scheduling and reminders
- Follow-up communications
- Billing inquiries and payment processing
- Promotions or special offers (if consented)
- Improving user experience
- Personalizing content

- Conducting market research

## **SMS Terms & Conditions**

### **1. SMS Consent Communication:**

The information (phone numbers) obtained as part of the SMS consent process will remain strictly confidential and will not be shared with third parties for marketing purposes.

### **2. Types of SMS Communications:**

If you consent to receive SMS messages from Le Spa Plastic Surgery, you may receive messages related to the following:

- Appointment reminders
- Follow-up messages
- Billing inquiries
- Promotions or special offers (when applicable)

Example message:

"Hello, this is a friendly reminder of your upcoming appointment with Dr. [Name] at [Location] on [Date] at [Time]. Reply STOP to opt out of SMS messaging at any time."

### **3. Message Frequency:**

Message frequency may vary depending on the type of communication. Typically, you may receive up to 3 SMS messages per week regarding appointments, billing, or promotional offers.

Example:

"Message frequency may vary. You may receive up to 2 SMS messages per week regarding your appointments or account status."

### **4. Potential Fees for SMS Messaging:**

Standard message and data rates may apply, depending on your mobile carrier's pricing plan. These fees may differ for domestic and international messages.

### **5. Opt-In Method:**

You may opt-in to receive SMS messages from Le Spa Plastic Surgery in the following ways:

- Verbally, during a conversation
- By submitting an online form
- By filling out a paper form

## **6. Opt-Out Method:**

You can opt out of receiving SMS messages at any time by replying "STOP" to any SMS message you receive. Alternatively, you may contact us directly at (754) 277-4120 to request removal from our messaging list.

## **7. Help:**

If you are experiencing any issues or need assistance, reply with the keyword "HELP" to any SMS message received. You may also contact us directly at (754) 277-4120.

## **8. Additional Options:**

If you do not wish to receive SMS messages, simply refrain from checking the SMS consent box on our forms.

## **9. Standard Messaging Disclosures:**

- Message and data rates may apply.
- You can opt out at any time by texting "STOP."
- For assistance, text "HELP" or contact us directly at (754) 277-4120.
- Message frequency may vary.

## **Your Data Protection Rights**

Under the GDPR, you have the following rights:

- Withdraw consent at any time
- Object to processing of your data
- Access and request copies of your data
- Request rectification of inaccuracies
- Request restrictions on processing your data
- Request deletion of your data
- Lodge a complaint with your data protection authority

## **Retention of Personal Data**

Your personal data is retained only as long as necessary to fulfill the purposes outlined in this privacy policy or as required by law. You may request the deletion of your data at any time, subject to legal obligations.

## **Changes to this Privacy Policy**

We may update this policy occasionally. We will inform you of significant changes via email, SMS, or prominently on our website.

For further questions or assistance regarding this privacy policy, please contact us at (754) 277-4120.

## **Mode and place of processing the Data**

### **Methods of processing**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### **Retention time**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## **Further Information for Users**

### **Legal basis of processing**

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;

- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### **Further information about retention time**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

### **The rights of Users based on the General Data Protection Regulation (GDPR)**

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.

- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

### **Details about the right to object to processing**

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been

disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

This document has been created with the iubenda Privacy and Cookie Policy Generator (<https://www.iubenda.com/en/privacy-and-cookie-policy-generator>). See also the Terms and Conditions Generator (<https://www.iubenda.com/en/terms-and-conditions-generator>). iubenda (<https://www.iubenda.com/en/>) hosts this content and only collects the Personal Data strictly necessary (<https://www.iubenda.com/privacy-policy/65675001>) for it to be provided.