

Pursuant to art. 13 of EU Regulation 679/2016

## (Processing of Personal Data of Users of the ParentsMile Multi-Service Platform)

www.**parents**mile.com

### 1 who processes my personal data?

The Data Controller is ParentsMile S.r.l., VAT no. 04286830247, with registered office at Contrà Mure Pallamaio 11, 36100 Vicenza (VI), Italy. You may contact the controller via phone at +3904441450986, email at [privacy@parentsMile.com](mailto:privacy@parentsMile.com), certified email (PEC) at [parentsMile@pec.it](mailto:parentsMile@pec.it).

### 2 why are my data processed and on what legal basis?

ParentsMile processes your personal data and those of the service beneficiary for the following purposes.

<i>purposes</i>	<i>legal basis</i>	<i>data provision requirement</i>
<i>To create your personal profile on the ParentsMile platform, where you can book and manage healthcare services, access telemedicine features, and use other services offered by ParentsMile. Further details are available in our Terms and Conditions.</i>	Processing is based on your explicit consent, which you may withdraw at any time by contacting the Data Controller or by adjusting your privacy preferences in your personal account settings.	Providing your data is optional, but failure to do so will prevent you from making bookings through the ParentsMile platform.

<p><i>Ensure the functionality of the booking system, including the (potentially automatic) matching between Users and Professionals, as described in section 7</i></p>	<p>This processing is also based on your explicit consent, which must be given by selecting the appropriate checkbox and may be withdrawn at any time by contacting the Data Controller or adjusting your privacy preferences in your user area.</p>	<p>Providing your data for this purpose is optional, but without it, Parentsmile will be unable to deliver the services requested.</p>
<i>purposes</i>	<i>legal basis</i>	<i>data provision requirement</i>
<p><i>To comply with administrative, tax, accounting, and all other legal obligations.</i></p>	<ul style="list-style-type: none"> <li>In this case, the processing of your personal data is lawful as it is necessary for the performance of the contract entered into with the Data Controller, and to fulfill the Controller's legal obligations in tax and administrative matters.</li> </ul>	<ul style="list-style-type: none"> <li>Providing your data is mandatory as it is required under the contractual agreement.</li> </ul>
<p><i>To respond to your inquiries or requests, and to provide you with support and assistance.</i></p>	<ul style="list-style-type: none"> <li>Processing is based on the Data Controller's legitimate interest in responding promptly to your requests and providing you with the requested information.</li> </ul>	<ul style="list-style-type: none"> <li>Providing your data for this purpose is optional; however, failure to do so will prevent the Controller from responding to your requests.</li> </ul>
<p><i>To send you newsletters and promotional communications from Parentsmile via email, as well as invitations to webinars and content on care-related topics, customized based on your preferences.</i></p>	<ul style="list-style-type: none"> <li>The processing of your data is lawful as it is based on your consent, which you may withdraw at any time by contacting the Data Controller or managing your privacy preferences within your personal account area.</li> </ul>	<ul style="list-style-type: none"> <li>Providing your data for this purpose is entirely optional and entails no negative consequences in case of refusal.</li> </ul>
<p><i>To share your personal data, as well as that of the service beneficiary, with third parties for the purpose of sending promotional communications.</i></p>	<ul style="list-style-type: none"> <li>The processing of your data is lawful as it is based on your consent, which you may withdraw at any time by contacting the Data Controller or managing your privacy preferences within your personal account area.</li> </ul>	<ul style="list-style-type: none"> <li>Providing your data for this purpose is entirely optional and entails no negative consequences in case of refusal.</li> </ul>

*To compile statistics aimed at evaluating the performance of the Parentsmile platform.*

- Processing is based on the Data Controller's legitimate interest in monitoring and analyzing the performance and success of Parentsmile.

- Data is provided at the time the relationship with the Controller is established. The data is processed in an anonymized format.

### 3 who receives my data?

Your data may be disclosed to external parties acting as Data Processors (pursuant to Art. 28 GDPR) or as independent Controllers. These may include:

- Parentsmile Professionals selected by you (they will access your and the beneficiary's data and act as autonomous Controllers).
- Partners and Lead generators
- Consultants (e.g., legal, tax, or insurance professionals.)
- Service providers (e.g., hosting and storage.)
- Payment service providers and financial institutions

You may request a complete list of data recipients by contacting [privacy@parentsmile.com](mailto:privacy@parentsmile.com).

### 4 will my data be publicly disclosed?

Your personal data will not be published or disclosed. However, if you leave a review about a Professional, your name and review may be visible to other registered users and the Professional concerned.

### 5 will my data be transferred outside the EU?

Personal data may be transferred outside the European Union. Parentsmile undertakes to transfer your data only to countries that ensure an adequate level of data protection. In cases where data is transferred outside the EU, such transfers will be carried out in accordance with one of the mechanisms permitted under applicable law, such as the adoption of countries subject to an Adequacy Decision, the use of Standard Contractual Clauses approved by the European Commission, or the implementation of other appropriate safeguards.

### 6 how long will my data be retained?

The Data Controller will retain your personal data, as well as that of the service beneficiary, for no longer than is necessary to fulfil the purposes for which the data is being processed. Specifically, data related to bookings will be retained for the entire duration of your use of the platform and, in the event of account deletion, for an additional period of 10 years.



Data processed for the purpose of sending newsletters and promotional communications from ParentsMile or third parties will be retained until you withdraw your consent. At the end of the respective retention periods, the Data Controller will irreversibly delete the data—through secure deletion or destruction methods—or retain it in an anonymized form that does not, even indirectly, allow for the identification of the individuals concerned.

## 7 how does ParentsMile works?

ParentsMile is a platform designed to match each user with the most suitable professional based on their specific needs. To do this effectively, ParentsMile must process personal data and service requests from both users and professionals within the ParentsMile network through automated or semi-automated systems. The software employs an algorithm that assigns a score to each professional based on the characteristics of their profile—such as qualifications, skills, geographical coverage, and other relevant criteria. It also analyzes the user's service request details, including the selected service, date and time slot, specific needs, and preferences. Based on this data processing, ParentsMile suggests to the user a list of professionals who best meet their requirements. If you would like more clarity on how your data is processed or on the logic behind the algorithm's recommendations, you may consult the agreements with ParentsMile or contact us at [privacy@parentsmile.com](mailto:privacy@parentsmile.com).

## 8 what are my rights?

Under EU Regulation 2016/679 (GDPR), you are entitled to a number of rights regarding your personal data, including:

- **Right of Access:** you have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning you is being processed. Where that is the case, you have the right to access such personal data—along with a copy—and to receive information regarding the processing;
- **Right to Rectification:** you have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you without undue delay, as well as the right to have incomplete personal data completed, including by providing a supplementary statement;
- **Right to Erasure ("Right to be Forgotten"):** you have the right to request the erasure of your personal data without undue delay where one of the following grounds applies:
  - the data is no longer necessary for the purposes for which it was collected or otherwise processed
  - you withdraw the consent on which the processing is based, and there is no other legal ground for processing;
  - you object to the processing and there are no overriding legitimate grounds for continuing the processing;



- the data has been unlawfully processed;
- the data must be erased to comply with a legal obligation to which the Controller is subject;
- **Right to Restriction of Processing:** you have the right to obtain restriction of processing when:
  - you contest the accuracy of the personal data, for a period enabling the Controller to verify the accuracy of such data;
  - the processing is unlawful, and you oppose the erasure of the data, requesting instead that its use be restricted;
  - the Controller no longer needs the data for processing purposes, but it is required by you for the establishment, exercise, or defense of legal claims;
  - you have objected to processing pending verification as to whether the legitimate grounds of the Controller override yours.
- **Right to Data Portability:** where processing is based on consent or a contract and is carried out by automated means, you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format, and to transmit those data to another controller.
- **Right to Object:** you have the right to object to processing carried out for the performance of a task in the public interest or in the exercise of official authority or based on the legitimate interests of the Controller or third parties. You also have the right to object to the processing of your personal data for direct marketing purposes, including profiling to the extent that it is related to such marketing.
- **Right Not to Be Subject to Automated Decision-Making:** you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

You may exercise your rights by submitting a request via email to the Data Controller at [privacy@parentsmile.com](mailto:privacy@parentsmile.com). The Controller will respond as promptly as possible and, in any case, within 30 days of receiving your request.

## 9 how can I lodge a complaint?

If you believe your data has been processed unlawfully, or you are dissatisfied with how a complaint was handled, you may contact the Italian Data Protection Authority (Garante per la protezione dei dati personali) via [www.garanteprivacy.it](http://www.garanteprivacy.it).

## 10 updates

This notice is subject to periodic updates. The latest revision was made on January 10, 2022.

