PRIVACY POLICY under art. 13 EU regulation 2016/679  
(General Data Protection Regulation)

This Application collects some Personal Data from its Customer.

Data controller

EALIXIR PRIVACY SERVICES LIMITED – Company n. 638103 - con sede in Harcourt Road - Harcourt Street - Dublin 2 - D02 T677, VAT IE3583009EH

Email of the Data controller: info@ealixir.com

As data controller, Ealixir Privacy Services Limited, in accordance with the art. 13 of the EU regulation n. 2016/679 (hereinafter, “GDPR”), informs that the data will be processed with the following purpose:

Types of collected data

The Personal Data collected by this Application, independently or through third parties, is: Cookies, Usage Data, name, surname, telephone number and email.

Full details on each type of collected data can be found in the dedicated sections of this privacy policy or in the specific text shown before the data is collected. Personal Data can be freely provided by the User or, in the case of Usage Data, collected automatically during the use of this Application. Some of the Data required by this Application are mandatory, and without it, it could be impossible for this Application to provide the service. If some information is not marked as necessary, Users are not required to give this information, without any consequence on the provision of the service.

If it’s not clear whether some Data is necessary or not, Users can get in touch with the Data Controller. The possible use of Cookies or other tracking instruments by this Application or by the owner of third services used by this Application, unless otherwise specified, has the purpose of providing the service to the Customer, in addition to further purposes described in this document and in the Cookie Policy, if available.

Users are responsible for the Personal Data of third parties shared through this Application and shall have the right to share them, making the Data Controller not responsible towards third parties.

Purpose of the processing of the collected data

The personal data is processed:
A) without the express consent of the user (art. 6 lett. b, and GDPR), for the following Service Purposes:
- complying with pre-contractual, contractual and tax obligations arising from relationships with the user;
- complying with obligations provided by the law, regulations, Community legislation or orders of the Authority;
- prevent or discover fraudulent activities or abuses that can damage the website;
- exercise the Data Controller’s rights, for example the right to defend in a trial.
B) with the User’s consent (art. 6 and 7 GDPR) for the following purposes:
- registration on the website through the specific form;
- research of undesired links associated with the name given by the customer;
- provide the service;
C) Only with the specific and separate consent of the user, for the following Marketing Purposes:
- sending newsletters, communications and/or other material about products and services offered by the Data Controller and invitations to events organized by the Data Controller.

Providing data and consequences of refusing to answer

Providing the data specified in point B) is mandatory. Without it, we cannot provide our services.
Giving the data specified in point C) is optional. It is therefore possible not to give any data, or to deny the possibility to process data which has already been given: in this case it won’t be possible to receive newsletters, marketing communications, and advertising material pertaining to the Services offered by the Data Controller. You will still be entitled to the services specified in point B).

Access to data

For the purposes listed above, data can be accessible:
- to employees and collaborators of the Data Controller as responsible and/or data processor and/or system administrator;

**Communication of data**

Even without the express consent (art. 6 point b) and c) of the GDPR), the Data Controller may communicate personal data for the purposes specified in point A) when the communication is mandatory by law or for carrying out the above-mentioned purposes.
The data will be processed by these subjects as independent data controller.
Data will not be disclosed.

**Data transfer**

The Personal data is stored in the working office of the Data Controller and in any other place in which the parties involved are located. For more information, please contact the Data Controller.
The Data Controller, if necessary, may move his servers even outside the EU. In this case, the transfer of data will take place in accordance with the applicable legal provisions, before the stipulation of the standard contractual clauses provided by the European Commission.

**Rights of the Data Subject**

As Data Subject, the user is entitled to the rights provided by art. 15 of the GDPR, and in particular the right:

i. to know about the existence of personal data concerning him, even if not yet registered, and to know that in an intelligible form;

ii. to know a) the origin of the personal data; b) its purpose and the way it is processed; c) the logic applied in case of processing with electronic instrument; d) the identification details of the data controller, of the persons in charge and of the appointed representative pursuant to art. 3, paragraph 1 of the GDPR; e) the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the Country, responsible persons or in charge;

iii. to obtain: a) updates, rectifications, i.e. the integration of the data whenever he wishes; b) the cancellation, transformation into anonymous form or blocking of unlawfully processed data, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) the proof that the operations specified in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disclosed, except if this is impossible or involves a clearly excessive use of means;

iv. to object, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning him for the purpose of sending advertising or direct sale materials or for carrying out market or commercial communication researches, through automated call systems without the intervention of an operator, by email and/or through traditional marketing methods by telephone and/or paper mail. The right of opposition of the data subject, set out in point b) above, for direct marketing purposes through automated methods, extends to the traditional ones and in any case it is also possible for the data subject to exercise the right of opposition partially. Therefore, the data subject can decide to receive communications only through traditional methods i.e. only automated communications or none of the two types of communication.

If applicable, he also has the rights specified in Articles 16-21 of the GDPR (Right to rectification, right to be forgotten, right to limitation of treatment, right to data portability, right of opposition), as well as the right to complain to the Authority for the protection of personal data pursuant to Article 77 of the GDPR, or to address to the appropriate judicial offices as provided by art. 79 of the GDPR.

**How to exercise rights - Data Protection Officer**

The Data controller appointed the Data Protection Officer (hereinafter "DPO").

Under Article. 38, par. 4, the data subject can contact the DPO, for any issue related to the processing of his personal data and the exercise of the rights provided by the GDPR, at the following email address: dpo@ealixir.one
Methods of processing collected data

The Data Controller will apply the appropriate security measures to prevent unauthorized accesses, disclosures, modifications or destruction of Personal Data.

The processing of personal data is carried out through the means described in art. 4 n. 2) of the GDPR and in particular: through IT and/or telematic tools, with organizational methods and logics strictly related to the above-mentioned purposes.

In some cases, in addition to the Data Controller, other parties involved in the organization of this Application may have access to the data (administrative, commercial, and marketing staff, lawyers, system administrators) i.e. external subjects (such as suppliers of third party technical services, postal couriers, hosting providers, IT companies, communication agencies) appointed, if necessary, Data Processor by the Data controller. The updated list of the Data Processors can always be requested from the Data Controller.

Legal basis of the processing

The Data Controller processes Personal Data relating to the User if one of the following conditions exists:

- the User has given consent for one or more specific purposes; Note: in some jurisdictions the Data Controller may be authorized to process Personal Data without the User's consent or without another of the legal bases specified below, as long as the User does not object ("opt-out") to this treatment. However, this is not applicable if the processing of Personal Data is regulated by European legislation regarding the protection of Personal Data;
- processing is necessary for the execution of a contract with the User and/or the execution of pre-contractual obligations;
- processing is necessary to fulfill a legal obligation to which the Data Controller is subject;
- processing is necessary to perform actions of public interest or for the exercise of public authority vested in the Data Controller;
- processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties.

In any case, it is always possible to ask the Data Controller to clarify the actual legal basis of each processing and in particular to specify whether the treatment is based on the law, on a contract or if it is necessary to conclude a contract.

Processing and storage times of collected data

The Data Controller will process the personal data for the period of time necessary to fulfill the above-mentioned purposes, and in any case for no more than 2 years from the termination of the relationship for the Purposes of Service, and for no more than 1 year from the collection of data for Marketing Purposes, or even before the deadlines reported here in case of request for cancellation and destruction from the data subject.
Further details on the processing of Personal Data

Statistics
The services contained in this section allow the Data Controller to monitor and analyze the traffic data and are used to keep track of User behavior.

Google Analytics (Google Inc.)
Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses the collected Personal Data to track and examine the use of this Application, to compile reports and to share them with other services developed by Google. Google may use the Personal Data to contextualize and personalize the advertisements of its advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: USA - Privacy Policy - Opt Out

Further information on the processing

Defense in court
The User's Personal Data may be used by the Data Controller in a possible trial or in the stages before it, for the defense against abuses in the use of this Application or its related services by the User. The User declares to be aware that the Data Controller may be required to disclose the Data on request of the public authorities.

Specific disclaimers
Upon request of the User, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information regarding specific services, or the collection and processing of Personal Data.

System logs and maintenance
Due to maintenance and operational needs, this Application and any third party services used by it may collect System Logs, i.e. files that record the interactions and may also contain Personal Data, such as the User's IP address.

Information not contained in this policy
More information about the processing of Personal Data may be requested at any time to the Data Controller using the contact information.

Changes to this privacy policy
The Data Controller may change this privacy policy at any time by giving notice to Users on this page. Please check this page often, keeping as a reference the date of the last modification at the bottom of it. In case of non-acceptance of the changes to this privacy policy, the User shall stop using this Application and may request the Data Controller to remove his Personal Data. Unless otherwise specified, the previous privacy policy will still be applied to Personal Data collected until then.

Definitions and legal references

Personal Data (or Data)
Any information about an individual, identified or identifiable, even indirectly, by reference to any other information, including a personal identification number.
Usage Data
Information collected automatically by this Application (or by third-party applications that this Application uses), including: IP addresses or domain names of the computers used by the User to connect with this Application, the addresses in URI notation (Uniform Resource Identifier), the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (success, error, etc.) the country of origin, the characteristics of the browser and the operating system used by the visitor, various temporal information of the visit (for example the time spent on each page) and details about the itinerary followed within the Application, with particular reference to the sequence of consulted pages, the parameters of the operating system and the IT environment of the User.

User
The individual who uses this application, which must be the data subject or be authorized by him, and whose personal data are the subject of the processing.

Data Subject
La persona fisica cui si riferiscono i Dati Personali.

Data Processor
The natural person, legal person, public administration and any other institution, association or body appointed by the Data Controller to process Personal Data, as provided by this privacy policy.

Data Controller
The natural person, legal entity, public administration and any other institution, association or body, even together with another data controller, responsible for the decisions regarding the purposes, the methods of personal data processing and the tools used, including the security profile, in relation to the use of this Application. The Data Controller is the owner of this Application.

This Application
The hardware or software tool through which the Personal Data of Users is collected.

Cookie
Small portion of data stored in the User's device.