

Privacy Policy

Information on the protection of personal data.
Art. 13 EU Reg. 679 of 27 April 2016

Pursuant to Article 13 of the “European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data, as well as the free circulation of such data” (hereinafter “GDPR”), Elysium Cell Bio Ita srl (hereinafter Elysium) with registered office in Via Gaetano Salvatore 486, 80145 – Italy, as Data Controller, is required to provide users who connect to the domain www.elysiumcellbioita.com (regardless of the purposes of the connection) with some information relating to the processing of personal data carried out therein.

This document constitutes the “Privacy Policy” of Elysium and the COMMUNITY “ Elysium Life” (hereinafter Elysium Life). For the purposes of this information, without prejudice to all definitions in art. 4 of the GDPR, the following definitions apply:

- ****Domain****: All the sites linked on the Elysium Life page of the site www.elysiumcellbioita.com are part of the Elysium Life Community
- ****Collection Points****: Areas within Elysium domains designated for the collection of personal data.
- ****Community****: the set of contents and applications functional to the provision of services accessible from the Elysium Life page of the website www.elysiumcellbioita.com.

I. – Warnings and Protection of Minors

The processing of personal data will apply the principles of lawfulness, correctness and transparency. Personal data will be collected for specific, explicit, legitimate purposes (purpose limitation) and will be adequate, relevant and limited to the purposes for which they are processed (data minimization). They will always be updated and accurate and stored for a period of time not exceeding what is necessary for the purpose of executing the Contract, without prejudice to the fulfillment of legal and tax obligations that establish longer retention periods (storage limitation). Personal data will be processed by adopting all appropriate security measures to guarantee their integrity, confidentiality and unavailability by unauthorized third parties (integrity and confidentiality).

Unless otherwise indicated, the provision of personal data through the collection points on the website www.elysiumcellbioita.com is reserved for those over 14 years of age.

II. Reference standards and legal bases of the processing.

The processing operations, which we will illustrate in detail below, have their legal basis in the rules that govern your right to the protection of your personal

data, your right to confidentiality, and finally in those that allow you to express or revoke, at any time, your informed consent to the processing operations, namely:

- Your informed consent, expressed in accordance with the current provisions of law on the protection of personal data where necessary (Art. 6. letter a) and Art. 9. letter a) of the GDPR);
- The fulfillment of contractual obligations assumed by Elysium in your favor at the time of your membership to the Service (Art. 6 letter b) of the GDPR);
- The fulfillment of obligations or orders to which the Data Controller is bound by law or by order of the Authority (Art. 6 letter c) of the GDPR);
- Reasons of public interest pursuant to Art. 9 letter i) of the GDPR and Art. 83 of EU Reg. 745 of the European Parliament and of the Council, of 5 April 2017, relating to medical devices;
- The legitimate interest of the Data Controller (Art. 6, letter f) of the GDPR);

III. – Nature of the data being processed.

The optional, explicit and voluntary sending of electronic mail to the addresses indicated on the Elysium sites entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message. Specific summary information will be progressively reported or displayed on the pages of the site set up for particular services on request. In any case - where required by law - you will be asked from time to time for consent to the processing of your personal data.

You can browse the public area of the Elysium Life Community or other Elysium sites without providing any personal information. In this case, Elysium only collects access data that do not allow us to trace your identity (for more details on the use of cookies for web analytics, see the paragraph of this Privacy and Cookie Policy below). Such data, which do not allow us to trace your identity, are analyzed by Elysium in order to improve its offering and Services. The personal data that you send to Elysium while browsing will be used only to provide the requested functions and Services. Only after your consent, where necessary, the following categories of personal data concerning you will be or may be processed for the purposes indicated below:

(a). – Common personal data and identification data. Such as, for example, Name and Surname, Date of Birth, Gender, Address, City, Province, Email address, copy of your identification document (only to confirm your identity in the event of winning competitions and/or prize operations), the operating system you are using, and the type of browser and other necessary electronic identifiers, the nickname you have chosen (the “User Name”), the password you have chosen, data relating to the payment instruments used in the case of purchases made, your image, your preferences, opinions, your purchasing habits, your interests, your occupation, your level of education, the composition of your family unit, your interactions with the Community and your activity index (WOM), your geographic location, Telephone number, ZIP code, Links to the profiles of the following social networks: Facebook, Instagram and Twitter, your profile name, description, profile image, profile URL and number of followers. **(b). – Special categories of personal data.** In the event that special categories of personal data pursuant to

art. 9 of EU Regulation 679/2016 are collected through the Elysium domain, you will be informed in advance and given the opportunity to express – in accordance with the law – the relevant consent where required.

(b.1). – If you decide to take part in the activities carried out by Elysium relating to the fulfillment of its obligations regarding Post Marketing surveillance, pursuant to art. 83 of EU Reg. 745/2018, personal data relating to your health status will be processed for the purposes indicated in this information.

(b.2). – As a member of the Elysium Life Community, you can participate in surveys, seminars on specific topics of a project or express opinions/experiences in the use of products and/or services or express comments, in accordance with the Terms and Conditions of Elysium Life.

(b.3). – In the event that the information provided should be relevant for the purposes of the provisions of law regarding the supervision of medical devices and/or food supplements, Elysium will proceed with the processing operations necessary in relation to the aforementioned obligations.

(c). – **Technical processing.** Non-identifying data, automatically recorded by the logical protection and access control devices to the domain (LOG FILES), are also processed. Such personal data will be used exclusively for the purpose of controlling network traffic to the Elysium domains . This information is not collected to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow you to identify users. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the site: except for this eventuality, at present, the data on web contacts does not persist for more than seven days.

(d). – **Data used for authentication.** Once registration is complete, during which you can decide on the relevant access credentials, including your password, which only you will know, you will be able to access the Elysium Life Community functions from a mobile device or desktop, by entering your chosen, personal authentication credentials in the appropriate fields, which you must keep with the utmost care. We recommend that you choose a password that has at least the following characteristics: a length of at least 8 characters and containing at least 4 types of characters including lowercase letters, uppercase letters, numbers, punctuation, including at least one special character. In the event that you forget your password, the recovery procedure includes a link to reset it independently. The authentication data will be encrypted from their first use and Elysium will not be able to know them in any way.

V. – Purpose of the Processing. Elysium, in addition to the treatments necessary in relation to legal obligations, regulations, or deriving from orders of the Authority, will carry out, exclusively with your consent, if necessary, the operations necessary to allow you to benefit from the services and features of the sites www.elysiumcellbioita.com and of Elysium Life and pursue the purposes indicated below; specifically: your registration as a member of the Elysium Life

Community; active participation in initiatives, such as Elysium Life projects (e.g. competitions or prize operations, events, surveys and comments, opinions/experiences in the use of products and/or services, webinars, seminars, Magazines, etc., organised by Elysium also in collaboration with its partners); respond to your requests, even if formulated via virtual assistant and be able to contact you and send you product samples or documentation relating to projects; allow you to benefit from the advantages related to your membership in the Elysium Life Community; marketing purposes through the sending by Elysium of the newsletter and/or promotional or advertising information on the services and/or products of Elysium , or of third parties; profiling purposes through the sending by Elysium of the newsletter and/or personalized information based on your preferences, promotional or advertising information on the services and/or products of Elysium , or of third parties, deemed by Elysium to be of interest to you; monitoring the progress of customer relations, credit and fraud risks associated with the services provided by Elysium , to assert or defend a right in court; in the case of filling out questionnaires relating to products, the processing is carried out for post-marketing surveillance purposes by the Data Controller, in compliance with a legal obligation (Art. 83 EU Reg. 745/2017), on the basis of the provisions of Articles 6 letter c), 9 letter i) of the GDPR. In particular, your data will be processed in the context of post-marketing surveillance activities for medical devices; statistical analysis purposes on aggregated personal data such as, for example, place of residence, gender, age, place of birth, level of education, email address. the creation, in anonymous form, of scientific informative and educational content dedicated to consumers and health professionals; customer loyalty also through competitions and/or prize operations.

Elysium Life Community” works If you are registered with the Elysium Life Community and have logged in with your credentials, you will be able to use the following Services.

a. Participation in Surveys As a member of the Elysium Life community, you can optionally participate in ongoing surveys on general topics (such as your interests, your occupation and education, or family and housing) as well as project-specific topics. The more you participate in surveys, the better we will be able to understand your interests and which Elysium Life Projects are right for you. If your opinion or interests change, you will later be able to change your answers on most general topics.

b. Comments As a member of the Elysium Life Community, you can leave comments on posts (e.g. blog posts, project page posts, seminars, webinars, positive experiences, chatbots, etc.) on various pages of the Elysium Life Community. If you leave a comment on a post, that comment, your Username, and the time the comment was left (time and date) will be visible to all visitors to the Elysium Life Community.

Comments are voluntary and governed by the Terms of Use and Participation. Comments published are not subject to prior control and can be read by other

users without your approval. However, any other user can comment on your comments and publish their own comment.

Elysium will endeavor to ensure compliance with the rules relating to comments on posts in accordance with the Terms of Use and Participation and to delete any comments that do not comply with these rules, as soon as it becomes aware of them.

Contact Reports/Photos/Other Content As part of your use of the Elysium Life Community, you may submit to Elysium and publish various types of content, such as contact reports, comments, reports, images, audio and video files or other contributions (the “Content”). All Content that you share publicly may be published by Elysium on the platforms that are part of the Elysium Life Community and therefore visible to all other visitors. In this case, the Content that you have shared publicly will be visible and, as the case may be, the date and time of entry and/or the Username you have chosen. d. Social Connect When you connect your Instagram account with your Elysium Life account, you will grant Elysium access to view your public profile. The personal data provided to Elysium Life may specifically include your profile name, description, profile image, profile URL and number of followers.

VII – Application and participation in Elysium Life Projects As a member of the Elysium Life Community, you can apply to participate in Elysium Life Projects of test&tell , challenges and other activations aimed at nanoinfluencers and, if selected for an Elysium Life Project in accordance with the Terms of Use and Participation, test and evaluate the products of a specific Elysium Life Project. Each Elysium Life Project is open to a limited number of participants who must meet certain criteria that are defined for each target group of the Elysium Life Project concerned. a. Application process When applying for a specific Elysium Life Project, you may be asked to answer additional questions related to that particular project, such as personal interests, current knowledge and experience related to the product to be tested. Elysium and Territory Influence SE SL, the latter owner of the platform that manages test&tell activities , challenges and other types of activation with nano influencers, will use the aforementioned information only for the purpose of examining your application for participation and identifying suitable candidates to participate in the Elysium Life Project. In addition, user data may be provided by Territory Influence SE SL anonymously to Elysium , whose products are tested in the context of the relevant Elysium Life project, in order to inform the latter about the potential group of participants and to give you the opportunity to participate in the selection of suitable participants. Your identity will not be revealed. b. Participation in Elysium Life Projects As a participant in a specific Elysium Life Project, you will generally be invited to participate in specific project surveys via the Elysium Life Platform and to let us know your experience and opinion on the tested product. Participation in the aforementioned surveys is voluntary. However, if you decide to participate in surveys, we may take this into account for the purposes of the Activity Index and the related data stored for this purpose (see paragraph VII-C below). Territory Influence SE SL or another delegate will send the results of these surveys anonymously to the Campaign Partner whose products are tested in the Elysium Life Project concerned, in order to inform them of the progress of the project and to provide them with an indication of the evaluation of the Elysium products by the participants . In addition, Elysium may re-evaluate your data that has been stored at a later time and pass it on to

the other Campaign Partners . Audiovisual and photographic recordings will be made during the events, including, but not limited to, video footage, photographs, interviews and user-generated content. This material may be used for informative, promotional and/or informational purposes through various channels, such as websites, social media, paper publications and public presentations. By participating in the events, you agree to the free and unlimited use of your voice image and any other personal representation present in the recordings for informative and promotional purposes, including any form of processing, adaptation, modification or reproduction of the material, provided that the dignity and decorum of the person portrayed is respected. The use of the image or voice in a predominant manner, for example as a testimonial or protagonist of an advertising campaign, as well as the use for commercial or profit purposes, will require the release of a specific written authorization by the interested party. This authorization must be requested and granted on site, during the event itself, and may include specific conditions or limitations. This information does not in any way affect the moral rights of authorship on the image and voice, which remain with the person portrayed. In case of doubts or requests for clarification, please contact the organizers of the event. c. Activity Points Index Based on your activities, Elysium obtains an index that shows your level of activity as a member of the Elysium Life community (hereinafter, the “Activity Points”). Different types of activities (offline or online) can influence your activity points, such as discussions with friends within an Elysium Life Project and contact reports sent, using comments, participating in project-specific surveys or helping with market research by interviewing friends and acquaintances based on market research documents provided within the Elysium Life Project. Elysium will retain your WOM activity index (and, to the extent required for calculating and updating the index, the underlying activities) to take into account when selecting participants for future Elysium Life Projects. Activity points may be one of several factors in selecting potential participants for a specific Elysium Life Project. The activities you engage in may also influence the awarding of “Activity Points”. Activity points are points you earn based on your level of activity within the Elysium Life community. For more details on activity points, please refer to the Elysium Life Terms of Use and Participation.

VIII. – Methods of processing your personal data. In relation to all the purposes indicated, your personal data will be subject to computer and paper processing and processed with profiling, pseudonymization and de-identification techniques in order to personalize the services that Elysium is able to offer you. The data will be processed in such a way as to guarantee their logical and physical security and confidentiality, and may be carried out through manual, computer and telematic tools capable of storing, transmitting and sharing the data themselves. The logic of the processing will be strictly related to the purposes pursued.

VIII.I. – Data security and storage. Except as specified in the dedicated information regarding Post Marketing Surveillance activities , in relation to the purposes referred to in letter (V.5) namely the provision of commercial or promotional information, the related processing will not concern particular categories of personal data, and will be carried out by the owner, following your prior consent. Your personal data will be stored within the European Union, the related security policies are reviewed in accordance with the Best Practices in the field. Elysium will store your comments as long as the post you commented on is present on the Elysium Life Community. During this period of time

your comments will be public. Access and operation traceability. Audit Log. Each access to the data will be stored in specific Log tables. The related information will contain the access timestamp , the identifier of the user who accessed the data; the type of data accessed, the user who owns the data, the operation performed, the application from which access was made.

VIII. II. – Profiling, automated decision-making. In addition to what is specified in V.6 and what is necessary to enable us to perform the services that allow you to use the services offered on the site, except as specified in our cookie policy, we do not carry out further profiling operations in relation to the data collected through the Elysium and Elysium Life systems. The information you provide us through your participation, regarding general topics or specific areas of interest, will be stored together with your profile and used only to select, based on the information provided, the Elysium Life projects most suitable for you and send you invitations and/or communications in this regard. Your responses will in no case be disclosed to third parties in the form of identifying information, unless you request it or unless you have expressly given your consent.

IX. – Recipients. The following may become aware of the personal data referred to in this information notice, in their capacity as Data Processors or Authorized Persons: within Elysium , qualified personnel, each limited to their own skills and duties and on the basis of the tasks assigned and the instructions given; outside Elysium , third parties, also specifically designated as Data Processors – of whom Elysium makes use for various services and exclusively to carry out such services – each limited to their own skills and duties and on the basis of the tasks assigned and the instructions given.

IX.I. – Communication (to specific external subjects) of data. Elysium , for ordinary management, accounting and administrative activities, may communicate your personal data, after obtaining your consent in accordance with the law, where required, in compliance with security measures, to third-party service providers for the sole purpose of performing the service requested by you, such as: – postal service companies, – law and notary firms, – consultants, including in associated form, – other service companies, as well as to other subjects in compliance with any legal obligations (such as insurance institutions, police forces, judicial authorities, etc.). The list of such subjects to whom the data may be communicated is available at the headquarters of the Data Controller.

X. – Transfer of personal data abroad. Elysium does not transfer personal data abroad on its own initiative. However, some third parties, service providers, may have their servers physically located abroad (as in the case of email providers). In such cases, the transfer of data abroad will take place exclusively within the scope and in compliance with EU Reg. 679/2016 Art. 44 et seq.

XI. – Rights of the interested party. Articles 15 to 22, GDPR grant interested parties the exercise of specific rights. Art. 15 GDPR grants interested parties the right to access their personal data and to obtain a copy thereof. The right to obtain a copy of the data must not infringe the rights and freedoms of others. With the request for access, the interested party has the right to obtain from Elysium confirmation as to whether or not their personal data is being processed and to know the purposes and categories of data processed, the third parties to whom the data are communicated and whether the data are transferred to a non-EU country with adequate guarantees. The interested party also has

the right to know the retention period of their personal data and has the right to request the rectification of inaccurate data and the integration of incomplete data, cancellation (right to be forgotten) under the conditions indicated in art. 17, GDPR, the limitation of processing, the revocation of consent, the portability of data and the right to object, at any time and without having to provide justifications, to processing for direct marketing purposes. The rights may be exercised by email to the Data Protection address Officer of Elysium , or by ordinary mail to the address indicated below. The Data Protection Officer may need to identify the interested party by requesting a copy of their identity document. The interested party who believes that the processing of their personal data violates the provisions of the GDPR or internal regulations on the protection of personal data has the right to lodge a complaint with the Personal Data Protection Authority based in Rome, pursuant to art. 77 GDPR and/or to appeal to the judicial authority. To exercise these rights, or to obtain any other information regarding them and, more generally, the processing of their personal data, requests may be sent by email to the following address: admin@elysiumcellbioita.com; – by regular mail to Elysium Cell Bio Ita Srl with registered office in Via Gaetano Salvatore 486, 80145 Naples, Italy.

XII. – Revocation of Consent Questions on Privacy Access and Feedback You are entitled at any time to revoke your consent to the processing of your personal data, including through the reserved area of our website. If you have questions or wish to have more information on the processing of your personal data or exercise the rights referred to in the previous n. VI, you can send an e-mail to the administrator of the Elysium website , writing to privacy@elysiumcellbioita.com. You can also contact us at the same address to have answers regarding the management of information by Elysium . Before Elysium can provide or modify any information, it may be necessary to verify your identity and answer some questions. We will provide a response as soon as possible.

XIII. – Data Controller. The data controller is Elysium Cell Bio Ita Srl with registered office in Via Gaetano Salvatore 486, 80145, Naples, Italy.

XIV. – Data Controllers. The complete list of Data Controllers is available at the Headquarters or by writing to the address: admin@elysiumcellbioita.com

XV. – Responsible for the Protection of Personal Data. The DPO is Prof. Massimo Zollo. E-mail: zollo@elysiumcellbioita.com

ID	Data type	Purpose	Legal basis	Retention period
1	Name, surname, age, family composition, email address, username, mobile number, electronic identifiers, geographic address, payment data.	Elysium Community Registration .	Art. 6 letter b)	Until you request the deletion of personal data. 36 months from the last access, 10 years for data relating to purchases for administrative accounting

ID	Data type	Purpose	Legal basis	Retention period
				purposes.
2	Name, surname, age, family composition, email address, username, mobile number, electronic identifiers, geographic address, photograph, request for participation, comments.	Participation in activities, projects, surveys and comments.	Article 6 lett . b) Art. 9. Letter a)	Until you request the deletion of your personal data.
3	Name, surname, email address, username, mobile number, electronic identifiers, geographic address, preferences.	Contact you and send you product samples or project documentation.	Art. 6 letter b)	Until you request the deletion of your personal data.
4	Name, surname, email address, username, mobile number, electronic identifiers, geographic address, photograph, comments, purchase data, copy of identification document.	Allow you to benefit from the advantages related to your membership in the Aboca Life Community (Loyalty).	Art. 6 letter b)	Until you request deletion of personal data – 24 months for loyalty.
5	Name, surname, email address, geographic address,	Sending newsletters and targeted communications.	Art. 6 letter a)	Until you request the deletion of personal data – 12 months for profiling

ID	Data type	Purpose	Legal basis	Retention period
	preferences.			– 24 months for marketing.
6	Name, surname, other data relating to the specific case.	Monitoring the progress of customer relations and credit and fraud risks associated with the services provided by ABOCA to assert or defend a right in court.	Art. 6 letter f)	Until you request the deletion of personal data. Limitation periods for the right defended or asserted.
7	Name and surname, data required in compliance with legal obligations.	Post-marketing surveillance.	Art. 6 letter c) Art. 9 letter i)	For as long as necessary for the purpose for which they were collected and/or as required by local laws or regulations.
8	Electronic identifiers, aggregated data.	Statistical analysis of aggregated personal data such as region of residence, gender, age, region of birth, level of education, anonymous creation of scientific content for dissemination and education dedicated to consumers and health professionals.	Art. 6 letter f)	As long as it is necessary for the purpose for which it was collected. Until you request the deletion of personal data.