

Privacy Policy for Trident Clinic

This privacy policy sets out how we use and protect any information that you give to TheBeautifulDentalClinic.com platform when you use our services. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our services, then you can be assured that it will only be used in accordance with this privacy statement. We may make changes to our policy by updating this page. Therefore, you should check this page prior to submitting your information to ensure that you are happy with any updates made.

SCOPE

The information collected on our platform is subject to the UK GDPR, Data Protection Act 2018, General Data Protection Regulation 2016/679 (Regulation (EU) 2016/679), also known as the GDPR, The Privacy and Electronic Communications Regulations and the E-Privacy Directive (2002/58/EC) in the context of Trident marketing activities. After Brexit, the legislation concerning data privacy in the United Kingdom is also applicable.

PRIVACY NOTICE

Who are we?

The Society of Aesthetic Dentistry Association in Romania ("SSER"), we are an association established in 2004, being the first professional association in Romania dedicated to the promotion of the modern principles of aesthetic dentistry, registered in the National Register of Associations under no.2797A/ 2004, with CIF (Tax Identification Code) 16448532. We set out to stand out through professionalism and exceptional quality services that are based on a set of values at a high level of demand. Thus, professionalism defines every service we offer, which is why we pay particular attention to protecting your data.

For further details on who we are please contact us at saser.ro

HOW DO WE USE YOUR PERSONAL DATA

We collect different data based on the purposes for which we process it:

- **TO SET UP A CONSULTATION IN DENTAL CLINIC**

In order to be able to schedule you for a consultation in our clinics in Romania, together with our commercial partners we will take care of booking the plane tickets and making the appointment in the clinic. Details about data processed for the plane booking and appointments you can ask our partners.

What personal data? Last name, first name, phone number, email address, passport number or identification number, date of emission of the document, language you speaker and citizenship.

Based on what legal basis? We process your data in order to answer your request before concluding a contract (Art. 6/1/b GDPR) and to pursue our legitimate interest to answer any questions, complaints, or recommendations you send us, and to improve the services and experience we offer to our customers (Art. 6/1/f GDPR).

How do we store the data? We will store your data in our communication database as long as our contract is active and after the end of the contract, we will keep the data in our archive for 10 years. Furthermore, the data registered through our website will be stored on the hosting provider's servers, located in the EU.

- **CONCLUDING CONTRACTS AND EXECUTING CUSTOMER REQUESTS**

We process in particular the information in the documents and the information necessary for concluding and fulfilling the contracts.

What personal data?

Name, surname, telephone number, e-mail address, signature, role in the company

Based on what legal basis?

We process your data for the execution of a contract (Art. 6/1 / b of Regulation (EU) 2016/679)

How do we store the data?

We will not keep personal data older than 5 years, calculated from the moment of termination of the contract, except for documents that are subject to storage conditions imposed by national law (eg accounting data)

- **WHEN YOU REACT TO OUR CONTENT POSTED ON SOCIAL MEDIA PLATFORMS OR YOU SHARE INFORMATION FROM OUR WEBSITE**

What personal data? Name, photo, any publicly accessible information on your social media profiles, or voluntarily communicated by you.

Based on what legal basis? We process your data in order to answer your request before concluding a contract (Art. 6/1/b GDPR) and to pursue our legitimate interest to answer any questions, complaints, or recommendations you send us, and to improve the services and experience we offer to our customers (Art. 6/1/f GDPR).

How do we store the data? Data shared with other platforms will be stored by them according to their own policies. In case we download data locally it will be stored on our secure, local and cloud servers.

- **TO ENHANCE AN EASY AND PLEASANT NAVIGATION ON OUR WEBSITE THROUGH THE USE OF COOKIES**

What personal data? Internet Protocol (IP), computer general location, device (country level), website viewing history, timestamp, request/action.

Based on what legal basis? We use cookies pursuing our legitimate interest, in order to make your experience on our website easy and pleasant (Art. 6/1/f GDPR). Non-essential cookies are not used without your consent (Art. 6/1/a GDPR).

How do we store the data? There are session cookies and persistent cookies. While the session cookies are deleted when the browser is closed, the persistent cookies may have a different lifetime, depending on the cookie's purpose. You may find more information about the lifetime of the cookies we use in our [Cookie Policy](#). Furthermore, the data will be stored on the hosting provider's servers, located in the EU, or the United Kingdom. In case we download data locally it will be stored on our secure, local and cloud servers.

- **FOR MARKETING AND COMMERCIAL COMMUNICATION**

What personal data? Last name, first name, phone number, email address.

Based on what legal basis? We process these data based on your consent (Art. 6/1/a GDPR) given to perform marketing communications and to pursue our legitimate interest in case you are our customer, and we consider that the information could be of great interest to you (Art. 6/1/f GDPR).

We will always offer individuals the right to opt-out of further communications and should the individual choose not to be contacted again, we will record this and ensure we do not communicate with that individual again.

How do we store the data? In case of a subscription to the newsletter, the data processing will continue until you request to unsubscribe you. In case of processing conducted in our legitimate interest, when you are already our customer, we will process your data during the performance of the contract and we will continue to do so for another [TBD retention period] of the contract. Furthermore, the data registered through our website will be stored on the hosting provider's servers, located in the EU, or the United Kingdom. Data shared with the newsletter will be stored on their servers, according to their policies. In case we download data locally it will be stored on our secure, local and cloud servers.

- **WHEN YOU SEND US A GDPR REQUEST**

What personal data? Last name, first name, email address, phone number, relation to the data subject in case the request is filled on behalf of another person, other information you voluntarily send us.

Based on what legal basis? We process your data in order to comply with our legal obligations under the GDPR (Art. 6/1/c GDPR).

How do we store the data? We will store your data in our communication database for a maximum of 60 days or until your request is finalised. Furthermore, the data registered through our website will be stored on the hosting provider's servers, located in the EU, or the United Kingdom. In case we download data locally it will be stored on our secure, local and cloud servers.

SHARING DATA WITH THIRD PARTIES

We share information about you with our partners who help us in the performance of our service. Among these we mention our processors:

- MRM Partners SRL who is empowered to have access to the database and to all the elements of the website in order to conduct the campaign optimally.

- Zooku Solutions S.R.L. who is empowered to have access to the database and the hosting services that the website offers.

Some of our external third parties are based outside the European Economic Area (“EEA”) so the processing of your personal data may involve a transfer of data outside the EEA. We will ensure that all transfers occur in accordance with applicable data protection laws, including concluding data transfer contracts if necessary.

Any transfers of personal data to countries which do not benefit from an adequacy decision issued by the EU European Commission, shall be made based on agreements using standard contractual terms adopted by the European Commission or other appropriate guarantees, under applicable law.

DATA PROCESSED BY SSER

SSER pays close attention to protecting your data and applies appropriate technical and organisational measures to ensure the protection of personal data is appropriate to the risks and categories of data protected. In particular, we protect your data by limiting the access to authorised persons, respecting the applicable laws, as well as taking measures against data change, loss, damage or destruction. SSER will not pass on your personal data to third parties without first obtaining your consent.

Important: After the data retention period ends, your data will be deleted. We will continue to use this data only after its irreversible anonymization in case we believe it could help us improve the quality of our products or services.

Our website may contain links to other websites that are not owned or controlled by us. Please note that we are not responsible for the privacy practices of other websites or third parties. We encourage you to be aware of this fact when you leave our website and to read the privacy policies of each website that may collect your personal data.

CONTROLLING YOUR PERSONAL INFORMATION

You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing, you may change your mind at any time by writing to, or emailing us at thebeautifuldentalclinic.com

You may request details of personal information which we hold about you under GDPR. If you would like a copy of the information held on you, please contact us directly.

YOUR RIGHTS AS A DATA SUBJECT

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Withdraw consent** – if the processing is carried out based on your consent, you have the right to withdraw it.
- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – you can ask for the data we hold about you to be erased from our records if:
 - The data is no longer needed for purposes for which they were processed.
 - You object to the further processing of personal data (see Right of Opposition below).
 - Personal data has been processed illegally.
 - You withdraw your consent based on which the processing takes place.
- **Right to restriction of processing** – you have a right to restrict the processing when:
 - You contest the correctness of personal data for the period in which we must verify its accuracy.
 - The processing is illegal, and you request the restriction of processing rather than deletion;
 - We no longer need your personal data, but you request it to state, exercise, or defence a right; or
 - You object to the processing while we verify that our legitimate reasons overtake your rights.

- **Right of portability** – you have the right to have the data we hold about you transferred to another organization.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to object to the legal effects in case you are the subject of automated processing or profiling.
- **Right to file a complaint** – In case of an alleged violation of the data protection legislation, you can file a complaint to the national supervisory authority for data protection or notify the Data Protection Officer at Trident. You can find the details for each of these contacts below.

COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by Trident or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and the Data Protection Officer at Trident.

The details for each of these contacts are:

- **Supervisory authority contact details:** Information Commissioner's Office (ICO)
<https://ico.org.uk/concerns/>
- **Supervisory authority in Romania:** Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal (ANSPDCP)
- **Contact Name:** DPO Cristiana Deca

EXERCISING YOUR LEGAL RIGHTS

To exercise your legal rights, or should you wish any other additional information on how we use your data, please contact our Data Protection Officer:

- By emailing office@clinicatrident.ro

This policy is effective from the 6 of December 2022.

