

Outdoor Aficionados Privacy Policy

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1. General

Asklepios Med Tech Srl, having its registered office in Str.Depozitelor nr. 23, 110138 Pitesti , Arges, Romania (hereinafter referred to as “Asklepios Med Tech Srl”, “we” and “ours”), as data controller, attaches great importance to the protection and respect of your privacy. The purpose of this Policy is to inform you about our practices regarding the collection, use and sharing of the information that you may provide to us via our platform Outdoor Aficionados (hereinafter “Platform”) that can be accessed from our mobile applications and websites.

This Policy (as well as our General Terms and Conditions of Use and any document referred to therein, as well as our [Cookies Policy](#)) describes the manner in which we process the personal data collected by us and provided by you. We invite you to read carefully this document to learn about and understand the practices we apply with regard to the processing of your personal data.

2. Information we collect

We may collect and process the following data:

2.1. Information you provide directly to us

By using our Platform, you provide us with information among which certain data are likely to identify you (hereinafter “Personal Data”). This is the case, in particular, when you fill in forms (such as the registration form), when you participate in one of our games, competitions, promotional offers, studies or surveys, when you contact us - whether by telephone, e-mail or any other means of communication - or when you inform us of a problem regarding the use of our Platform.

This information mainly includes the following data:

2.1.1. The data required to register for the service we provide on our Platform or to access any other service provided by us. Such data include your first name, last name, e-mail address, gender and telephone number. This information is mandatory. If this information is not provided, Asklepios Med Tech Srl will not be able to provide

to you the services proposed by our Platform and you will not be authorised to create an account on our Platform;

2.1.2. A profile photo;

2.1.3. Your mailing address;

2.1.4. A copy of all the correspondence exchanged in writing between you and Asklepios Med Tech Srl;

2.1.5. A copy of all the participations and publications on our Platform;

2.1.6. The details of your visits on our Platform and the content you have accessed;

2.1.7. As applicable, your answers to our surveys and questionnaires, as well as your feedback about the hiking tours made via our Platform, this information being in particular likely to be used in research and analyses regarding users' behaviour;

2.1.8. The data we may ask you to provide when you report a problem regarding our Platform or our services, such as the purpose of your request for assistance.

2.1.9. Your geolocation data, where you have accepted that we collect and treat such data, to enable you to indicate the departure locations, the points of interest, shelters or arrival locations of your hiking tour and to be able to validate these;

2.1.10 The photos added to the gallery of a hiking tour, made from your phone;

2.10.11 The average score received as Participant and Organiser, the number of received reviews, the number of organised hiking tours and the number of participations in hiking tours organised on Outdoor Aficionados.

2.2. The data we collect automatically

2.2.1 If you register for our services via the functionality that allows you to integrate into your Platform profile information from your account in the Outdoor Aficionados mobile application or website, we will have access to certain data from your Outdoor Aficionados account (last name and first name, profile photo, e-mail address, telephone number, average score received, number of reviews received and number of hiking tours made via Outdoor Aficionados, as well as the information whether your e-mail address has been verified).

2.2.3. During each of your visits, we may collect, in accordance with applicable legislation and with your consent, as applicable, information regarding the devices on which you use our services or the networks from which you access our services,

such as, in particular, your IP addresses, connection data, types and versions of Internet browsers used, types and versions of your browser's plugins, operating systems and platforms, data concerning your browsing history on our Platform, in particular your browsing history on the various URL pages of our Platform, the content you access or consult, the search terms used, any download errors, the duration of consultation of certain pages, the advertising identifier of your device, the interactions with the page, as well as any telephone number you use to contact us. Among the technologies used to collect this information, we use in particular cookies (for more information, please refer to our [Cookies Policy](#)).

2.2.4. We also collect information about your use of our Platform (such as the number of hiking tours published, your registration date, etc.), which may be displayed in your public profile.

2.3. Retention period of your data

Your Personal Data are archived and deleted immediately after the following actions:

- (i) after deleting your account from the mobile application;
- (ii) when an administrator has determined that your account information does not comply with our rules listed in the General Terms and Conditions.
- (iii) if you have not validated your e-mail address at the time your account was created.

3. How do we use the data we collect?

We use the data we collect for the following purposes:

- (i) To perform the contracts concluded between you and us and to provide you with the information and services requested; this processing is necessary for the performance of our respective contractual obligations.
- (ii) To send you documents and information necessary for the use of our services (such as booking confirmations) by e-mail, SMS or any other means of communication; this processing is necessary for the performance of our respective contractual obligations.
- (iii) To enable you to personalise your profile on our Platform; this processing is based on your consent.

(iv) To ensure compliance with (a) applicable legislation, (b) our General Terms and Conditions of Use, and (c) our Privacy Policy. In the event of a breach by you we may suspend your account on our Platform. For these purposes, we may use technologies to analyse automatically your use of the Platform, in order to detect any behaviour that might be a breach on your part; such processing is (a) necessary for the performance of our respective contractual obligations, (b) based on your consent, or (c) necessary for the establishment, exercise or defence of legal claims.

(v) To send you, in accordance with applicable legal provisions and based on your consent where required by law, marketing, advertising and promotional messages and information relating to the use of our services, booking procedures, or to suggest and recommend goods or services likely to be of interest to you, by e-mail, SMS or any other means of communication. We may also use your data to send you advertising messages that may be of interest to you on social media platforms or third-party sites. If you need more information on this topic, please refer to the contractual documents of these platforms; this processing is based on your consent where required by law or our legitimate interest (in such cases, you have the option to withdraw your consent or to object to such processing).

(vi) To inform you, by e-mail, SMS or any other means of communication, of changes to our services and to assist you in using our services. This processing is necessary for (a) the performance of our respective contractual obligations, (b) compliance with our legal obligations or (c) the establishment, exercise or defence of a legal claim or (iv) is based on our legitimate interest (to provide you with relevant information). In this case, you may object to such processing at the time of each contact.

(vii) To manage our Platform and carry out internal technical operations as part of problem-solving, data analysis, testing, research, reviews, studies and surveys; this processing is based on our legitimate interest (to ensure the security of our Platform and improve its features).

(viii) To improve and optimise our Platform, in particular to ensure that the display of our content is adapted to your device; this processing is based on our legitimate interest (to provide you with relevant content).

(ix) To follow up customer relations and, in particular, to carry out (by e-mail or SMS) satisfaction surveys and studies, including polls, product tests and statistics; this processing is based on our legitimate interest (to evaluate our Platform and the services we provide in order to improve them). You may object to such processing when you contact us.

(x) To enable you to use the interactive features of our services if you wish to do so, such as indicating the departure locations, the points of interest, shelters or arrival locations of your hiking tours; this processing is necessary for the performance of our

respective contractual obligations or is based on your consent where required by law.

(xi) To help us maintain a safe and secure environment on our Platform, in particular by preventing fraud; this processing is (a) based on our legitimate interest (to ensure the security of our Platform), (b) necessary to comply with our legal obligations or (c) necessary for the establishment, exercise or defence of a legal claim.

(xii) To evaluate the effectiveness of the advertising messages we send and to customise these for our users. This processing is based (a) on our legitimate interests (to measure and optimise the effectiveness of our campaigns) or (b) on your consent where required by law.

4. Who are the recipients of the information collected by us and why do we share this information with them?

(i) As part of your use of our services, some of your information is shared with other members of our community or external users who wish to participate in a hiking tour via our Platform as part of the participation process (for instance, we share your data with the hiking tour organiser).

(ii) We may also share information about you, in particular Personal Data, with other entities part of the Outdoor Aficionados group, as provided for in this Policy. In the event that we sell or acquire a business or assets, we reserve the right to share your Personal Data with the potential seller or buyer of such business or assets. If Outdoor Aficionados or all or part of its assets is purchased by a third party, the data in our possession will be transferred to the new owner as applicable.

(iii) We may disclose information about you to courts of law, law enforcement agencies, customs authorities, governmental or public authorities, tax authorities or authorised third parties, if and to the extent we are legally required to do so or if we believe in good faith that it is necessary (i) in order to respond to any claim against Outdoor Aficionados, (ii) to comply with any judicial request, (iii) to enforce any contract concluded with our members, such as the General Terms and Conditions of Use and this Privacy Policy, (iv) in case of emergencies that threaten public health or the physical integrity of a person, (v) as part of inquiries and investigations, or (vi) to

guarantee the rights, assets and security of Outdoor Aficionados, its members and, more generally, any third party;

(iv) We also work closely with third parties who may have access to your Personal Data, in particular with :

- our business partners on whose websites we may advertise our services;

- subcontractors we employ mainly for technical services, or suppliers of analytical solutions;

(iv) We only share your data with the third parties mentioned under 4.iii. above in the following cases:

(a) When we employ a service provider as part of the performance of any contract entered into between you and us, or in order to provide or improve our services;

(b) As part of the booking process, we may, in order to provide the requested services, display on our Platform or share with another member some of your Personal Data such as your first name, photo, mobile phone number or e-mail address;

(c) When we employ providers of search engines and analytical solutions to improve and optimise our Platform;

(d) When you expressly request us to do so (for example, when you subscribe to a service provided by one of our partners, or ask to benefit from an offer or special deal from one of our partners);

(e) When we publish on the websites of our business partners certain parts of our Platform (including the hiking tours posted by you) by using APIs or widgets. In this case, certain information from your public profile may also be displayed on these websites;

(f) When we are legally required to do so or if we believe in good faith that it is necessary (1) in order to respond to any claim against Asklepios Med Tech Srl, (2) to comply with any judicial request, (3) to enforce any contract concluded with our members, such as the General Terms and Conditions of Use and this Privacy Policy, (4) in case of emergencies that threaten public health or the physical integrity of a person, (5) as part of inquiries and investigations, or (6) to guarantee the rights, assets and security of Asklepios Med Tech Srl, its members and, more generally, any third party;

(g) If we sell or acquire a business or assets, we reserve the right to share your Personal Data with the potential seller or buyer of such business or assets.

(h) If Asklepios Med Tech Srl or all or part of its assets is purchased by a third party, the data in our possession will be transferred to the new owner as applicable.

(v) In accordance with applicable legislation and based on your consent where required, we may aggregate data about you that we receive from or transfer to our business partners, including all or part of your Personal Data. Such aggregated information will only be used for the purposes described above.

(vi) We draw your attention to the fact that, if you decide to grant us access to some of your information, including your Personal Data, via the login services provided by our business partners, their privacy policies are binding on you as well. We have no control over the collection or processing of your data by our business partners on their own platforms without making any individual decision.

5. Targeted advertising, e-mail, SMS sent by us to you

In accordance with applicable legislation and based on your consent where required, we may use the data you provide on our Platform for marketing purposes (for example (a) to send you our newsletters, (b) to send you invitations to our events, and (c) to display targeted advertising on social media platforms or third-party sites) according to your profile and based on your centres of interest.

As regards communications for commercial prospecting purposes: You may withdraw your consent at any time by (a) clicking on the unsubscribe link included in each of our e-mails, (b) unchecking the relevant box in your account, or (c) contacting us as described in Article 12 below.

As regards targeted advertising:

On social networking platforms (such as Facebook or Twitter): you can object to this processing at any time by configuring the advertising settings of your account directly on the social networking platform or by contacting us as described in Article 12 below.

On third party websites: you can refer to our [Cookies Policy](#) to understand how you can withdraw your consent.

6. Are your data transferred? How and where?

As a rule, we store your Personal Data in the European Union. However, to the extent that, for example, some of our service providers are located in countries outside the European Union (“Third Countries”), we transfer some of your Personal Data to Third Countries. This may in particular be the case of Third Countries for which the European Commission has not made a decision regarding the “adequate level of protection”. In such cases, we ensure that the transfer is carried out in compliance with the applicable regulations and guarantees a sufficient level of protection of the privacy and fundamental rights of individuals (in particular by using the standard contractual clauses of the European Commission).

7. What are your rights in relation to your personal data?

(i) You have the right to receive a copy of your Personal Data in our possession (“Right of Access”).

(ii) You may also request the erasure of your Personal Data, as well as the rectification of your Personal Data that are inaccurate or obsolete (“Right to Erasure” and “Right to Rectification”). Please note that we may retain certain information about you when the law requires us to do so or when we have a legitimate reason to do so. This is the case, for example, if we believe that you have committed fraud or breached our General Terms and Conditions of Use and we wish to prevent you from breaching the rules applicable to our community.

(iii) You also have the right to object (a) at any time to the processing of your Personal Data for direct marketing purposes or (b) for reasons relating to your particular situation, to the processing carried out on the basis of our legitimate interest (“Right to Object”).

(iv) You have the right to restrict the processing of your Personal Data (“Right to Restriction of Processing”) Please note that this right only applies if (a) you contest the accuracy of your Personal Data, for a period enabling us to verify the accuracy of such data; (b) in case of unlawful processing by us if you request that that the data processing be restricted instead of the data being erased; (c) we no longer need the

Personal Data for the purposes of processing, but the data is required by you for the establishment, exercise or defence of legal claims; (d) you have exercised your Right to Object pending the verification whether the legitimate grounds we pursue override your legitimate interests.

(v) You have the right to lodge a complaint with the competent supervisory authority or to obtain remedies from the competent courts if you consider that we have not respected your rights.

(vi) You also have the right to the portability of your data, which means the right to receive the Personal Data you have provided to us in a structured, commonly used and machine-readable format and the right to transmit those data to another controller (“Right to Data Portability”).

(vii) You also have the right to define directives concerning the treatment of your Personal Data after your death.

8. Confidentiality of login codes

You are responsible for the confidentiality of the login codes we have sent you to access your account on our Platform.

You undertake to keep such codes secret and not to disclose them to any other person.

9. Links to other websites and social media

Our Platform may sometimes contain links to websites of our partners or third party companies. Please note that such websites have their own privacy policies and we do not accept any liability for the use by such websites of the information collected when you click on such links. We recommend that you read the privacy policies of such websites before entering your Personal Data.

10. Cookies and similar technologies

For more information, please refer to our [Cookies Policy](#).

11. Changes to our Privacy Policy

We may modify from time to time this Privacy Policy. When we need to do so, we will notify you. We recommend that you check this page regularly for any changes or updates to our Privacy Policy.

12. Contact data and Data Protection Officer

For any question about this Privacy Policy or any request concerning your Personal Data, you can contact us by e-mail at support@outdooraficionados.com or by sending a letter to the address mentioned at the beginning of this document.