Privacy Notice

of Doctorsa by Doctorsa S.r.l.

Introduction

Welcome to the Doctorsa Privacy Policy.

This Privacy Notice (“Notice”) sets out the terms under which we handle your personal data while you use Doctorsa in accordance with article 13 of the General Data Protection Regulation (“GDPR”). Your privacy is very important to us and the GDPR allows us to protect your personal information.

“Personal data” is any information relating to an identifiable living individual. This encompasses information that directly identifies a person (like their name or address) as well as indirect identifiers (random IDs) that, when combined with other pieces of information, could reasonably be used to pinpoint a specific person.

Personal data collected through Doctorsa will be processed solely and exclusively for the purposes described in this document and will not be used for any other purpose.

Who processes your personal data?

Only for the purposes mentioned under section “why do we process your data” the Data Controller is:

Doctorsa S.r.l.

Via Privata del Gonfalone 3 - 20123 - Milano (MI)

If you have any questions related to how we process your personal data you can contact us at any time by sending an email to: info@doctorsa.com

Data Protection Officer

To further strengthen your data protection, we've appointed a dedicated Data Protection Officer (DPO), who you can contact if you have any questions about how your personal data is processed, or if you believe your privacy rights may have been infringed.

You can contact our DPO by sending an email to: doctorsa-dpo@chino.io

What data do we process?

Doctorsa S.r.l. will process the following categories of personal data:

Categories of personal data	Special category of data	Examples of data processed
Common data - Education and Profession	No	Expiration date for registration with the medical association
		Institution where the doctor is registered or accredited
		Medical association registration number
		Photo of the doctor's professional identification card
		Preferred method of providing the service
		Type of medical service offered by the doctor
		Workplace
Common data - Physical characteristics	No	Access to the camera without saving or recording (only if the doctor provides authorization)
		Microphone access without recording (only if the doctor provides authorization)
		Spoken languages
Common data - Other Personal	No	Statistical information on the number of visits made by the doctor, type and number of doctor's services booked, and amounts relating to the services provided by the doctor
Common data - Geolocation	No	Precise device location
Identifiers - Personal Information	No	Birthplace
		Date of birth
		Email
		Identification document (identity card or passport)
		Last Name
		Name
		Phone number
		Tax ID code
Identifiers - Financial	No	Invoice data
		Tax and payment receipt data (e.g. IBAN code)
		VAT number
Identifiers - Online	No	Information about the browser and device used to connect
		IP address

Why do we process your data?

We will process your personal data for the following purposes:

Purpose	Activities	Legal basis (art. 6 and art. 9)	Provision of personal data	Data Categories
Access and navigation on the website	Access and navigation on the website Allow access and navigation on the website hosting the Doctorsa platform and on all pages of the company's domains.	6(1)(b) Contractual and/or Pre-contractual	Data provision is automatic when you access the website. Refusal to provide data would make it impossible to access the website.	Common data - Geolocation Identifiers - Online
IT infrastructure management and maintenance	IT system administration of the platform We have appointed the data processor company WeSync S.r.l. as our outsourced System Administrator, which, in turn, has outsourced the role of System Administrator to the professional Adebayo Mustafa. This professional, acting as sub-processor and in accordance with the instructions given by us and by WeSync S.r.l., will perform the tasks assigned to him through a specific System Administrator designation letter.	6(1)(b) Contractual and/or Pre-contractual 6(1)(f) Legitimate interests	Providing data is optional, but without it, we cannot provide the platform with the necessary security guarantees for the personal data processed.	Common data - Education and Profession Common data - Physical characteristics Common data - Other Personal Identifiers - Personal Information Identifiers - Financial Identifiers - Online
Management of the contractual relationship with doctors	Creating an account for the doctor To start a partnership relationship to provide healthcare services on the Doctorsa platform, doctors must first begin the onboarding process by clicking https://doctorsa.com/join/. During this process, the information needed to create an account on the Doctorsa platform and manage the contractual and partnership relationship with the doctor is collected.	6(1)(a) Consent 6(1)(b) Contractual and/or Pre-contractual 6(1)(c) Legal obligation 9(2)(a) Explicit consent	Providing data is optional, but without it the doctor cannot provide his services on the Doctorsa platform.	Common data - Education and Profession Common data - Physical characteristics Identifiers - Personal Information Identifiers - Financial
	Statistical analysis for doctors Doctors can view their own statistics regarding telehealth consultations performed, services provided (etc.).	6(1)(a) Consent 6(1)(b) Contractual and/or Pre-contractual 6(1)(c) Legal obligation 9(2)(a) Explicit consent	Providing data is optional, but statistical information is collected automatically by the platform.	Common data - Other Personal
	Use of the platform To provide telehealth visits, the doctor must provide authorization and therefore consent to the use of the microphone, camera, and the device's precise location (collected on a non-continuous basis).	6(1)(a) Consent 6(1)(b) Contractual and/or Pre-contractual 6(1)(c) Legal obligation 9(2)(a) Explicit consent	Providing data is optional, but not providing it might impact the proper functioning of this platform.	Common data - Physical characteristics Common data - Geolocation

Purpose	Activities	Legal basis (art. 6 and art. 9)	Provision of personal data	Data Categories
				Identifiers - Personal Information

Device permissions for Personal Data access

Depending on the Doctor's (hereinafter also simply "User") specific device, the Doctorsa platform (hereinafter also simply "Application") may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document. The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of this Application.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by this Application.

Camera permission, without saving or recording Used for accessing the camera or capturing images and video from the device. This Application does not save or record the camera output.

Microphone permission, without recording Allows accessing and recording microphone audio from the User's device. The recording feature is not used on this Application.

Precise location permission (non-continuous) Used for accessing the User's precise device location. This Application may collect, use, and share User location Data in order to provide location-based services. The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for this Application to derive the exact position of the User on a continuous basis.

Do we disclose your data to anyone?

We will not disclose personal data to third parties, unless such disclosure is necessary to carry out certain processing activities.

This might be the case where:

- We need to rely on certain service providers (e.g.: IT service providers, consultants) and in such cases, we ensure that our suppliers, acting as Data Processors under Article 28 GDPR, will only process your personal data under appropriate confidentiality and security obligations and in accordance with our instructions and with this Notice;

- When required by law or when we have a legitimate interest to do so (to comply with requests from judicial authorities or other legal obligations; to bring or defend a claim or lawsuit; as part of a reorganization, merger, or the transfer of our assets to another company).

Do we transfer your data outside the EU/EEA?

Your personal data will be processed within the European Union and the European Economic Area. Should it be necessary for your personal data to be transferred to third countries outside the EU/EEA, such data transfers will take place only to third countries with an Adequacy Decision in place approved by the European Commission or, in case of no Adequacy Decision, based on Standard Contractual Clauses provided by the European Commission and additional security measures to ensure data security.

How long do we retain your personal data?

We will retain your personal data only as long as necessary to fulfill the purposes for which we collected it, including purposes related to fulfilling legal, tax or accounting obligations.

A longer retention period may be required in the event of a legal complaint or in the event of disputes related to our existing contractual relationships.

To determine the retention period of personal data, we take into account:

- the purposes for which we process the personal data, and whether we can achieve those purposes by other means;
- the amount, nature and sensitivity of the data processed;
- the potential risk of harm to individuals derived from unauthorized use or disclosure.

If personal data is no longer necessary for the purposes or legitimate interests pursued by us, and no other legal basis applies, we will delete your data.

How do we support you in exercising your rights?

We inform you that you have the right to:

- Ask us whether or not your personal data is being processed, and if so, request access or ask for copies of your personal data. You can also ask us for further information related to this Policy (Right of Access);
- Ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete (Right to rectification);
- Ask us to erase your personal data in certain circumstances (Right to erasure or 'right to be forgotten');
- Object, under certain circumstances, to the processing of personal data, for reasons relating to your specific situations (Right to object);
- Not be subjected to automated decision-making, including profiling (Rights related to automated individual decision-making, including profiling);
- Receive personal data in a standardized format in case you wish to transfer them to another data controller (Right to data portability);
- Lodge a complaint at any time with the Data Protection Authority, in case of violation of data protection rights (Right to lodge a complaint with a Supervisory Authority);
- Ask us to restrict the processing of your information in certain circumstances (Right to restrict the processing);
- In the event of rectification, erasure, or restriction of the processing of your personal data, we are committed to notifying such changes to all recipients to whom the data has been disclosed, unless this proves impossible or involves disproportionate effort;
- Withdraw your consent at any moment.

The exercise of rights is not subject to any formal constraints and is free of charge.

You may exercise your rights by contacting our DPO at the following address doctorsa-dpo@chino.io

Links to third parties websites

Doctorsa may contain links to websites operated by third parties. We are not responsible and have no control over how they operate or how they process data. We encourage you to read their privacy notices before using those websites.

Cookies

Cookies are small text files stored on users' devices by the server of the website they are visiting and contain information about the user's navigation that can be read by the same server in subsequent browsing sessions. Cookies do not harm the device and enable a better browsing experience. We use cookies on our domains doctorsinitaly.com and doctorsa.com. For more information, please read our Cookie Policy.

Updates

This Policy may be subject to changes and reviews.

All personal data processed is subject to this Policy effective at the time it was collected.

Any changes to this Policy will be posted on this page and, if necessary, notified to you.

We encourage you to consult our Policy periodically so that you are always informed about how we process your personal data.

This Policy was last updated on 15/04/2026