

## Privacy Policy

Last Updated April 21, 2021

I appreciate that you are on this page, that means that your data matters to you, and you want to know the destination of the same and who collects it.

In accordance with the provisions of the General Regulation (EU) on Data Protection, by accepting this Privacy Policy you give your informed, express, free and unequivocal consent so that the personal data that you provide through the website <https://www.sunshineoxygen.com/> (hereinafter WEBSITE) are included in a file of "WEB USERS AND SUBSCRIBERS" as well as "CUSTOMERS AND / OR SUPPLIERS":

My company name is: Sunshineoxygen S.L.

My Tax Identification Number (CIF) is B05328778

My registered office is at Mas les Mimoses, 17834 Camos (Girona) Spain

Email: [hello@sunshineoxygen.com](mailto:hello@sunshineoxygen.com)

My social activity is:

- (1) Healthcare and healthtech consultancy firm. Including all sorts of services regarding consultancy and advisory. Participation in direction boards in different public and private stakeholders (pharmaceutical industry, public and private administration, Centres of Reference and hospitals, medical societies, patient associations, etc.  
Operating also in the environments point-of-care, telehealth, shipment and delivery.
- (2) On-line & off-line training including the publication of guidelines, books and handbooks.
- (3) Development and shuttle of technological solutions around the healthcare and healthtech fields.

### 1. WHAT IS PERSONAL DATA?

A small approximation is important, therefore, you should know that it would be any information related to a person who provides us when you visit our website, in our case name and email, and if you buy a product requiring an invoice, we will request full address, name, surname and DNI or CIF.

Additionally, when you visit our website, certain information is automatically stored for technical reasons such as the IP address assigned by your Internet access provider.

### PRINCIPLES FOR DATA PROCESSING

To process your personal data, I will apply the following principles according to the RGPD:

- Principle of legality, loyalty and transparency: I will always require your consent for the processing of your personal data for one or more specific purposes that I will inform you in advance with absolute transparency.
- Principle of data minimization: I will only request data that is strictly necessary in relation to the purposes for which I require it.
- Principle of limitation of the conservation period: as you can see later, the data will be kept for no longer than necessary for the purposes of the treatment, depending on the purpose, I will inform you of the corresponding conservation period, in the case of subscriptions, I will periodically review my lists and delete those records that have been inactive for a considerable time.
- Principle of integrity and confidentiality: Your data will be treated in such a way that adequate security of personal data is guaranteed and confidentiality is guaranteed. You should know that I take all measures aimed at preventing unauthorized access or improper use of my users' data by third parties.

## 2. PURPOSE, LEGITIMATION, CATEGORY OF DATA COLLECTED, CONSENT TO TREATMENT, MINORS.

### 2.1 PURPOSE

As stated in the regulations, the USER is informed that, through contact forms, or subscriptions data are collected, which are stored in a file, with the sole purpose of sending electronic communications, such as: bulletins (newsletters), new entries (posts), commercial offers, free webinars, as well as other communications that Sunshineoxygen S.L. understands interesting for its USERS. The fields marked as mandatory, are essential to achieve the stated purpose.

Likewise, it may comply with the data, to the requirements requested by the USERS. Ultimately, the PURPOSE is as follows:

- The sale of training on Online Business.
- The sale of Ebooks.
- Manage the list of subscribers and users attached to the web.
- Provision of content on the blog
- Direct your network of affiliates and merchants as well as their payment management.

Only the owner will have access to their data, and under no circumstances will this data be transferred, shared, transferred, or sold to any third party.

Acceptance of the privacy policy, through the established procedure of dole opt-in, will be understood for all purposes as the provision of EXPRESS AND INEQUIVOUS CONSENT of the USER to the processing of personal data in the terms set out in the this document, as well as the international transfer of data that occurs, exclusively due to the physical location of the facilities of the service providers and data processors.

In no case will a different use be made than the purpose for which the data has been collected, much less will I transfer this data to a third party.

## 2.2 MINORS

In the event of being over fourteen years old, you can register at <https://sunshineoxygen.com/> without the prior consent of your parents or guardians. What happens if you are under 14 years of age?

In this case, the consent of your parents or guardians will be a mandatory condition so that we can process your personal data

Warning: If you are under fourteen years old and you have not obtained your parents' consent, you cannot register on the web, so we will proceed to deny your request if we are aware of it.

## 2.3 LEGITIMATION

Thanks to consent, we can process your data as a mandatory requirement to be able to subscribe to the website.

As you well know, you can withdraw your consent at any time you want.

## 2.4 CATEGORY OF DATA

The data collected at no time are specially protected, but are categorized as identifying data.

## 2.5 DATA CONSERVATION TIME

I will keep your data for the legally established time or until you request to delete it.

## 2.6 ACCURACY AND VERACITY OF THE DATA

Obviously you are solely responsible for the veracity and accuracy of the data you send me, exempting me from any type of responsibility in this regard.

As a user, you must guarantee the accuracy and authenticity of the personal data provided, having to provide complete and correct information in the different data collection forms.

## 3. COMPLIANCE WITH APPLICATION REGULATIONS

Sunshineoxygen S.L. complies with the General Regulation (EU) on Data Protection, ensuring the correct use and treatment of the user's personal data.

In compliance with the provisions of the regulations, we inform you that the data supplied, as well as those data derived from your browsing, may be stored in the files of Sunshineoxygen S.L. and processed for the purpose of meeting your request and maintaining the relationship that is established in the forms that you subscribe. Additionally, the USER consents to the processing of their data in order to inform them, by any means, including email, of products and services of Sunshineoxygen S.L.

In case of not authorizing the processing of their data for the purpose indicated above, the USER may exercise their right to object to the processing of their data under the terms and conditions provided later in the "Exercise of Rights" section.

## 4. SECURITY MEASURES

Sunshineoxygen S.L. informs you that it has implemented the necessary technical and organizational security measures to guarantee the security of your personal data and avoid its alteration, loss and unauthorized treatment and / or access, taking into account the state of technology , the nature of the stored data and the risks to which they are exposed, whether they come from human action or from the physical or natural environment. All in accordance with the provisions of the RGPD.

Likewise, Sunshineoxygen S.L. has established additional measures in order to reinforce the confidentiality and integrity of the information in its organization.

Continuously maintaining the supervision, control and evaluation of the processes to ensure respect for data privacy.

Likewise, as you can see, the website has an SSL certificate so the security of your data is guaranteed.

## 5. EXERCISE OF RIGHTS

Those individuals who have provided their data through <https://sunshineoxygen.com/>, may contact the owner of the same in order to freely exercise their rights of access to their data, rectification or deletion, limitation and opposition regarding the data incorporated in their files.

The fastest and easiest method would be to access your user account directly and modify your data or delete your user account. Any information that we need to store, by virtue of a legal or contractual obligation, will be blocked and only used for said purposes instead of being deleted.

The interested party may exercise their rights by written communication addressed to Sunshineoxygen S.L. with the reference "Data protection", specifying their data, proving their identity and the reasons for their request at the following address:

Sunshineoxygen S.L.

Mas les Mimoses, 17834 Camos (Girona)

Spain

You can also exercise your rights, through email:

[hello@sunshineoxygen.com](mailto:hello@sunshineoxygen.com)

## 6. LINKS OR EXTERNAL LINKS

As a service to our visitors, our website may include hyperlinks to other sites that are not operated or controlled by the Website. Therefore <https://sunshineoxygen.com/> does not guarantee, nor is it responsible for the legality, reliability, usefulness, veracity and timeliness of the contents of such websites or their privacy practices. Please note that their privacy practices may differ from ours before providing your personal information to these non-<https://www.sunshineoxygen.com/> websites.

## 7. MODIFICATION OF THE PRIVACY POLICY

Sunshineoxygen S.L. reserves the right to modify its Privacy Policy, according to its own criteria, motivated by a legislative, jurisprudential or doctrinal change of the Spanish Agency for Data Protection.

Any modification of the Privacy Policy will be published at least ten days before its effective application. The use of Sunshineoxygen S.L. after said changes, will imply the acceptance of them.

## 8. RESPONSIBLE FOR THE FILE, AND RESPONSIBLE FOR THE TREATMENT

The person responsible for the data file is Sunshineoxygen S.L..

As data managers other than the aforementioned person in charge:

Sunshineoxygen S.L. has contracted the Hosting services to OVH HISPANO S.L CIF: B-83834747. Registered in the Madrid Mercantile Registry in volume 19.514, foil 74, section 8, paper sheet M-342678, inscription: 1<sup>a</sup> You can consult the privacy policy and other legal aspects of said company at the following link:

<https://www.ovh.es/proteccion-datos-personales/>

As a webinar platform, Everwebinar and Hopin services are used.

## 9. SERVICES OFFERED BY THIRD PARTIES ON THIS WEBSITE

To provide services strictly necessary for the development of my activity, <https://sunshineoxygen.com/> uses the following providers under their corresponding privacy conditions.

Hosting: OVH Hispano

Web platform: WordPress.Org

WordPress template: own

Webinar platform: Everwebinar and hopin

Payment methods: Stripe and Paypal

Privacy of tracking sources used on this site: Google (Analytics)

At <https://sunshineoxygen.com/> the preferences of its users, their demographic characteristics, their traffic patterns, and other information are also studied together to better understand who our audience is and what they need. Tracking our users' preferences also helps us show you the most relevant advertisements.

The user and, in general, any natural or legal person, may establish a hyperlink or technical link device (for example, links or buttons) from their website to <https://sunshineoxygen.com/> (the "Hyperlink"). The establishment of the Hyperlink does not imply in any case the existence of relations between <https://sunshineoxygen.com/> and the owner of the site or of the web page in which the Hyperlink is established, nor the acceptance or approval by

<https://www.sunshineoxygen.com/> of its contents or services. In any case, <https://sunshineoxygen.com/> reserves the right to prohibit or disable any Hyperlink to the Website at any time.

#### 10. DO YOU NOT WISH TO RECEIVE INFORMATION FROM US OR DO YOU WANT TO REVOKE YOUR CONSENT?

You can oppose the use of your information for advertising purposes, market research or development of satisfaction surveys at any moment, as well as revoke your consent at any time (without retroactive effect).

To do this, you must send an email to the address [contact@sunshineoxygen.com](mailto:contact@sunshineoxygen.com). If you have received advertising by email, you can also oppose said email, by clicking on the link included in it, following the instructions that are provided to you. Another simpler way would be to access your user account and select the corresponding options.

Please bear in mind that our systems may require a period of time that in no case will exceed 48 hours for your opposition or revocation to become effective, it being understood that during that period of time you can continue to receive messages. In relation to the management of your data associated with the social profiles of Sunshineoxygen S.L., the exercise of the right of access will depend on the functionality of the social network and the possibilities of accessing the information of the user profiles. Regarding the rights of access and rectification, we recommend that it can only be satisfied in relation to that information that is under the control of Sunshineoxygen S.L..

In addition, you can stop interacting, follow or receive information from the social profiles of Sunshineoxygen S.L., delete the content that no longer interests you or restrict who shares your connections with, through the mechanisms stipulated in the different social networks.

The user will be able to access the privacy policies of each Social Network, as well as configure their profile to guarantee their privacy. Sunshineoxygen S.L. encourages users to familiarize themselves with the conditions of use of the different social networks before starting to use them.

Facebook: <https://www.facebook.com/help/323540651073243/>

Twitter: <https://twitter.com/privacy>

Instagram: <https://help.instagram.com/155833707900388>

Linkedin: <https://www.linkedin.com/legal/privacy-policy>

## 11. PERSONAL DATA CAPTURE SYSTEMS AND ITS PURPOSE

1) Contact form: There is a contact form whose purpose is to answer questions, suggestions or professional contact. In this case, the email address

hello@sunshineoxygen.com will be used to respond to them and send the information that the user requires through the web, this data will be stored on the servers of Google, <https://policies.google.com/>.

2) Cookies: When the user registers or browses this website, "cookies" are stored. The user can consult the cookie policy at any time to obtain more information on the use of cookies and how to deactivate them.

5) Sale of information products: Through the website, information products can be purchased, in this case, buyer data (Name, surname, address and email) are required through the platform.

6) Users may unsubscribe at any time from the services provided by <https://sunshineoxygen.com/> from the same Newsletter through a cancellation form.

7) Tracking systems used on this site: Google (Analytics), at <https://sunshineoxygen.com/> the preferences of its users, their demographic characteristics, their traffic patterns, and other information are also studied together to better understand who makes up your audience and what they need. Tracking our users' preferences also helps us show you the most relevant advertisements.

## 12. SOCIAL PLUGINS

On our website we offer you links and services related to different social networks (eg "Like" Facebook). If you are a member of a social network and you click on the corresponding link, the provider of the social network may link your profile data with the information of your visit to said website.

Therefore, it is convenient to inform you about the functions and policies on the processing of personal data of the respective social network, if you access one of our web pages with any of your profiles on social networks or share information through them.

You can access the privacy policies of the different social networks at any time, as well as configure your profile to guarantee your privacy. We encourage you to familiarize yourself with the conditions of use of these social networks before starting to use them:

Facebook: <https://www.facebook.com/help/323540651073243/>

Twitter: <https://twitter.com/privacy>



Instagram: <https://help.instagram.com/155833707900388>

Linkedin: <https://www.linkedin.com/legal/privacy-policy>

### 13. ACCEPTANCE, CONSENT AND REVOCABILITY

The User declares to have been informed of the conditions on protection of personal data, accepting and consenting to the treatment thereof by Sunshineoxygen S.L. in the manner and for the purposes indicated in the legal notice.

As you well know and we have communicated to you throughout these privacy policies, you can revoke your data at any time, but always without retroactive character.