

MY I.D. APP – INFORMATION ON PERSONAL DATA PROCESSING pursuant to art. 13 reg. (EU) 2016/679 (so-called “GDPR”)

Dear User,

Rivacold s.r.l. (see below) provides you with the legally required information on the processing of your personal data through this app, as required by art. 13 reg. (EU) 2016/679, so-called “GDPR”.

If you have not signed up on the appropriate portal provided by Rivacold s.r.l. you can only access the *News* and *Contacts* sections of the app. If you have signed up, you can also access the other sections of the app, after logging in. Using the *Select* section requires, in addition to the login, also specific authorisation by Rivacold s.r.l.. Using the *My Vision* section requires, in addition to the login, also signing the subscription conditions to the IoT services and purchasing the relevant services.

NB: If you have not signed up, Rivacold s.r.l. **does not process** your personal data with this app. This information notice therefore applies to **Registered Users only**.

Type of processed data and retention time

The following categories of personal data of Registered Users are processed by Rivacold s.r.l. through this app:

- i.** login credentials (ID corresponding to the email used in signing up with Rivacold and password). They are required for providing the required service, in compliance with art. 122 of It. Legislative Decree 196/03. Retention: the information is stored in the app until logging out (remember to log out, if other people might access the app!), deleting the *cache* or changing user.
- ii.** Any Select authorisation and/or IoT subscription. This information is initially retrieved by the app by connecting to the recording database. It is required for providing the required service, in compliance with art. 122 of It. Legislative Decree 196/03. Retention: as per item i above.
- iii.** Connection between the User and the machinery activated. Retention: not locally and parametrised to the duration of User recording. Deletion of the recording results in the deletion of the types of personal data in question. As a rule, synchronisation of recording deletion on the app takes place within 24 hours.

Furthermore:

- iv.** In the *Contacts* section and in the *Unit Activation* function it is possible to activate the GPS (optionally), in order to allow contacts near the place where the User is to be found, in the former case and, in the latter case, the machines to be managed more precisely. As a matter of fact, knowing their position helps optimise support services, by identifying the closest technicians, as well as improve machine performance, which also depends on environmental conditions. Retention: in compliance with art. 126 of It. Legislative Decree 196/03, the

geolocation information is used strictly for the functions described above and it is **not** stored in association with the User's data. No tracking is performed.

- v. The *Smart Control* section makes it possible to connect (optionally) to the machinery via Bluetooth, this results in the technical information required for the Bluetooth connection being exchanged between the User's device and the machinery. We do not store such information.
- vi. For the purpose of activating the Rivacold machinery via this app, the User may choose (optionally) to enter the appropriate activation code or their QR code. In the latter case, the app must activate the device's camera. The technical information for extracting and entering the activation code is not stored by Rivacold s.r.l.

Data Controller and contacts

- Data Controller: RIVACOLD SRL, Tax ID 00956400410, website: www.rivacold.com,
- Privacy contacts: privacy.rv@rivacold.com, tel.: 0721/919911, registered office: 61022 - Fraz. Montecchio, Vallefoglia (PU), Via Sicilia no. 7

Purposes of processing and legal basis

Purpose 1 – Supply of mobility tool: the provision of the app's functions serves the legitimate interest of Rivacold s.r.l. to grant to registered subjects (e.g. customers, end buyers of the machinery, consultants with VAT, employees, if appropriate) a computerised tool to make it easier to use activation, monitoring and maintenance services of Rivacold machinery on the move (including a summary of activated ones) and also to provide useful technical/commercial information related to the machinery as well as to the installation/support/sale network. The legal basis is art. 6.1.f) GDPR (legitimate interest).

Purpose 2 – Execution of User requests: the aim of the processing is to execute the specific functions of the app that you select from time to time as the User and to also execute prior contractual agreements, where any (e.g. IoT subscription that includes use of the app). The legal basis is art. 6.1.b) GDPR (contract or pre-contractual measure). In the case of GPS activation (see item iv above), the basis is consent, in compliance with art. 126 of It. Legislative Decree 196/03, free and always revocable (by deactivating the GPS on the device). For data retention see above.

Purpose 3 – Exercise/defence of rights: all the personal data subject to retention may also be processed for the aim of exercising/defending rights by Rivacold s.r.l. (e.g. disputes related to operation of the app). The legal basis is art. 6.1.f) GDPR (legitimate interest). Retention for this specific purpose: as a rule it coincides with the retention times already indicated above. If however, there is a reasonable possibility of a dispute, the Data Controller reserves the right of further retention parametrised to the statutory limitation periods (e.g. ordinary civil law statute of limitations 10 years, subject to interruption as per the law).

Categories of recipients of the personal data

The personal data described above, processed via the app, may be accessible, if required, to subjects authorised to process them (e.g. RIVACOLD employees and associates); professionals and other types of legal entities with whom Rivacold s.r.l. cooperates for technical needs (e.g. developers, designers, engineers, installers, lawyers in the event of disputes); occasionally institutional entities (e.g. Judiciary offices in the event of disputes or independent authorities, e.g. Data Protection Authority, in the cases foreseen by law).

Transmission outside the EU

It is not foreseen. The personal data are processed within the European Union.

Automated decision-making processes

We do not perform automated decision-making processes on your data. We do not perform profiling activities.

Necessary/not necessary provision of the data

The provision of your log-in credentials is optional, but lack thereof will not make it possible for you to access sections other than *News* and *Contacts*.

In particular Bluetooth: the app works even without activating Bluetooth, but in that case it will not be possible to use the *Smart Control* service.

In particular GPS: the app works even without activating GPS, but lack thereof will not make it possible to identify, in the *Contacts* section, the installers/dealers/customers that are closer to the User, and in the *Unit Activation* section, it will not be possible to improve machine management. Note: in some smartphone/tablet models, Bluetooth activation might lead too malfunctions if the GPS is not activated. This situation is beyond Rivacold's control.

In particular camera for scanning the QR code: the app works even without activating the camera, but in that case it won't be possible to scan the QR code for activating the machinery and the User will be forced to enter the code manually

Rights

You have the right to:

- access your personal data (art. 15 GDPR), i.e. have information related to their existence, categories of data, retention time, purpose of processing, legal basis, recipients, any solely automated processing, rights that you may exercise;
- rectify (art. 16 GDPR) your personal data of an objective nature, in case of errors or integrate them in case of incompleteness;

- erase your personal data (art. 17 GDPR) when they are no longer necessary or there is no legal basis for the processing or if you validly object to the processing or if the processing is unlawful or if the data must be erased to fulfil a legal obligation;
- restrict processing (art. 18 GDPR), that is, you can obtain that the personal data are marked specifically for the time necessary to ascertain their accuracy in the event of a dispute or to ascertain the validity of any objection made or however if you request restriction in the case of unlawful processing or if you need your personal data to exercise a right;
- to request portability of the personal data (art. 20 GDPR) processed with automated means on the basis of consent or contract (therefore the right is excluded in the cases where the legal basis is art. 6.1.f GDPR). In that case the data shall be transmitted to you in a structured form and/or, on your request, they shall be transmitted to another Data Controller, if technically feasible, in compliance with the GDPR.
- object (art. 21 GDPR) to processing, at any time, providing a reason, subject to the prevalence of legitimate statutory reasons, or with no need to substantiate in the case of marketing (also understood in the sense of purpose 4 described above).
- lodge a complaint to the competent Supervisory Authority (art. 77 GDPR and art. 140-*bis* et seq. It. legislative Decree 196/03): that of the place where you habitually reside or where you perform your work or where the alleged violation occurred. In the case of Italy, the competent authority is the Data Protection Authority (www.garanteprivacy.it). Abroad: https://edpb.europa.eu/about-edpb/board/members_it

Date of last information notice revision: September 2020