

## PRIVACY POLICY

Protection of users' privacy is important for Rivacold srl. ("Rivacold"). This notice describes how Rivacold collects, utilizes and discloses personal information that users provide to Rivacold as they use the app Smart Control (hereinafter, the "App"), both directly (via browser) and through the app Smart Control.

### 1. Controller

- 1.1. *Controller Identity.* Rivacold srl, with registered office at Via Sicilia, 7 61022 Fraz. Montecchio, Vallefoglia (PU) Italy, email [info@rivacold.com](mailto:info@rivacold.com), is the Controller for users' personal data collected through the App.
- 1.2. *Out of Scope: Cloud Service.* The App allows users to control and monitor their refrigerating (HVAC-R) systems directly (via bluetooth connection). The data processing through the cloud service is regulated by the dedicated privacy policy. The third-party supplier of the external cloud service is not responsible for the processing of personal data carried out by such third parties.
- 1.3. *Out of Scope: Content Manager.* Graphical user interfaces needed to manage HVAC-R Systems are not embedded in the App, but are downloaded from external content managers, provider by a third-party supplier, and dynamically displayed at runtime by the App depending on the connected HVAC-R System. The App may download and display different graphical user interfaces depending on the HVAC-R System connected to the App. The same holds for possible HVAC-R systems' documentation downloaded and made available by the App. Some content managers may require the user to register and provide personal data to access some contents (graphical user interfaces and/or documentation). The third-party supplier is not responsible for the processing of personal data carried out in the Content Manager.

### 2. Users Data Collected and Purpose and Legal Bases Of The Processing

- 2.1. *Crash Data Automatically Collected Through The App.* In the case of an App crash, the App automatically collects certain details about the crash and sends them to Rivacold or third-party supplier of the App. This information includes: a random identifier generated by the App when first launched after installation, to the only purpose of identifying repeated crash events on the same device; App version and build number; Device model and operating system used; error stacktrace and navigation stack before the crash.

The purpose of this processing is to improve the app and to ensure its security. The legal basis for this processing is the legitimate interest of Rivacold or third-party supplier of the App to manage and ensure the security of the App and to fix its bugs.

Crash data are kept for a maximum of 60 (sixty) days after which they are deleted. Some crash data may be kept for a longer period if necessary to fix a bug or to ensure the security of the App, and deleted when the bug is fixed or the security issue is solved.

- 2.2. *Disclosure Of Users Personal Information.* Crash data will be stored and processed in servers located within the EU and EEA territory.

Rivacold or third-party supplier of the App staff may become aware of your personal data. In particular, the data may be disclosed under the Controller's or Processor's (where appointed) authority: to the IT systems repair and maintenance staff and to the App development team. In no circumstances will your personal data be disseminated and/or communicated to third parties.

### 3. Modifications

- 3.1. *Changes To This Notice.* This notice may be altered occasionally at Rivacold's discretion in order to adapt to changes at Rivacold, ongoing technological developments and amendments to the law. You may receive a notification about these changes through an in-app notification, if you consented to it.
- 3.2. *Applicable Version.* Rivacold or third-party supplier of the App will collect, use and disclose your personal data in accordance with the version of this notice that is in force from time to time. All new versions of the notice will be published on the App. When using the App, it is advisable to check the date of the notice and any changes that have been made since the last version, as well as to regularly check the notice in force so that you are always aware of the version in use.

### 4. Users Rights

In accordance with Articles 7, 13, 15, 16, 17, 18, 19, 20, 21, 22 of the UE Regulation 679/2016 you can, in any time, exercise the following rights, by contacting Rivacold at [privacy@rivacold.com](mailto:privacy@rivacold.com), for any issue related to such exercise:

- the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- the right to obtain from the Controller confirmation as to whether personal data concerning you are being processed;
- the right to obtain the access to your personal data;
- the right to request from the Controller rectification or erasure of your personal data;
- the right to request from the Controller restriction of processing of your personal data;
- the right to object to the processing of your personal data;

- the right to receive the personal data concerning you, which you have provided to Controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (data portability - applicable only for automated data processing based on contract or consent).
- Furthermore, if you believe that your rights have not been respected, you can file a complaint with the competent Supervisory Authority.