

PRIVACY POLICY STATEMENT

UNDER ART. 13 REGULATION (EU) 2016/679 (“GDPR”) - REGISTRATION TO THE MY VIMEC APP

1. Who is the “data controller” for personal data processing (in other words, who decides on the purposes and methods of processing)

The data controller is Vimec srl, headquartered in Via Parri, 7 42045 Luzzara (RE), VAT No. 00758850358, e-mail info@vimec.biz (hereinafter, “Company”).

2. How to contact the “data protection officer” (“DPO”)

The DPO can be contacted at the e-mail address dpo@vimec.biz

3. Purpose, legal basis for processing and data retention period

The Manufacturer, as Data Controller, informs the user that the mobile application collects data according to the following processing purposes:

For what purpose are the data processed?	What is the legal basis for the processing?	How long do we keep the data?
System location data: These data are collected in order to ensure the system location is kept in the event of a Dealer ceasing operations.	The performance of a contract to which the data subject is a party plus consent to the location of the telephone	Data will be retained for the duration of registration to the My Vimec app. After this period, the data will be destroyed or anonymised in accordance with the cancellation and back-up procedures.
User identification data (First Name, Last Name, Address, Telephone, Email): This data is required to enable the Manufacturer to initiate communications relating to system maintenance activities	The performance of a contract to which the data subject is a party	<i>see above</i>
Service telephone number: This information is essential to identify the entity responsible for the maintenance of a given system, thus ensuring efficient cooperation between the application, the end user and the relevant service.	The performance of a contract to which the data subject is a party	<i>see above</i>
Machine operating data: The Manufacturer processes machine operating data in order to optimise and improve its products, ensuring continuous quality development of the solutions offered	The performance of a contract to which the data subject is a party	<i>see above</i>
App usage data: This data, analysed in an aggregated form, can help the Manufacturer understand how the app is used and identify any usage patterns. This information can be useful for improving the usability and efficiency of the app.	The performance of a contract to which the data subject is a party	<i>see above</i>

The Manufacturer ensures that all processing is carried out in full compliance with the principles of lawfulness, correctness, transparency, purpose limitation and data minimisation in accordance with current legislation.

4. Nature of data provision

Pursuant to art. 13, par. 2, letter e) of the GDPR, we inform you that the provision of data is necessary. Therefore, any refusal or failure to provide such data will result in the impossibility of registering to the My Vimec app and using the relevant features.

5. Subjects authorised for processing

Personal data will be processed by employees and/or contract staff of the Company who have received appropriate operating instructions and who have been expressly authorised to process them by the Company.

6. Data recipients

The data may be communicated and processed, on behalf of Visup, by third parties who provide the Company with services or facilities instrumental to the purposes indicated in this privacy notice, to whom appropriate operating instructions are given, designated as data processors and possibly data subprocessors pursuant to art. 28 of the GDPR, for example, companies that offer website maintenance and hosting.

The data may be communicated to third parties in their capacity as data controllers (such as, by way of example, authorities and supervisory and control bodies and, in general, public or private entities entitled to request/receive the data).

7. Extra-EU transfer

The data will be transferred to 'third countries', i.e. established outside the European Union (EU) or the European Economic Area (EEA) and, in particular, to countries where the recipients mentioned in subsect. 6 above are based, in accordance with the relevant regulations set out in Chapter V of the GDPR (Art. 44 et seq.). Specifically, the transfer of data to countries without an adequacy decision of the European Commission pursuant to art. 45 GDPR will be based on an adequate guarantee pursuant to art. 46 GDPR (such as standard contractual clauses or binding corporate rules).

8. Rights of the data subject¹

Data subjects may exercise against the Company the rights recognised in art. 15–22 of the GDPR and in particular:

- i) request access to the data concerning them and to the information referred to in art. 15 (purpose of processing, categories of personal data, etc.);
- ii) request cancellation in the cases provided for in art. 17 if the Company no longer has the right to process them²;
- iii) obtain the rectification of inaccurate data or the integration of incomplete data;
- iv) obtain the restriction of processing (i.e. the temporary submission of data to storage only), in the cases provided for in art. 18 GDPR³;
- v) receive the data in a structured, commonly used and machine-readable format, as well as, if technically feasible, transmit them to another data controller without hindrance, if the processing is based on consent or on contract and is carried out by automated means.

These rights may be exercised by sending a written notice to the Company or by e-mail to the above-stated addresses.

Finally, data subjects have the right to lodge a complaint with the Data Protection Authority or, in any event, with the competent supervisory authority in the Member State where they habitually reside or work or in the State where the alleged infringement occurred.

Data retention

Indicated in the Licensing document

¹ Please be reminded that in accordance with the GDPR “*data subjects*” are the natural persons to whom the data refer.

² The data subject has the right to obtain the deletion of their data in particular in the following cases:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws the consent on which the processing is based in accordance with art. 6.1, lett. a), or art. 9.2, lett. a), and if there is no other legal basis for the processing;
- c) the data subject objects to the processing pursuant to art. 21.1, and there is no overriding legitimate ground for processing, or objects to the processing pursuant to art. 21.2;
- d) the personal data have been processed unlawfully;
- e) the personal data must be erased in order to comply with a legal obligation under European Union or Member State law to which the data controller is subject;
- f) the personal data were collected in relation to the provision of services of the information company specified in art. 8.1.

³ The cases in which it is possible to obtain limitation of processing are as follows:

- a) the data subject disputes the accuracy of the personal data, for as long as the data controller needs to verify the accuracy of such data;
- b) the processing is unlawful and the data subject objects to the deletion of the data and requests instead that their use be restricted;
- c) the data controller no longer needs the data, but the data are necessary for the data subject to ascertain, exercise or defend a right in court;
- d) the data subject has objected to the processing pursuant to art. 21.1 of the GDPR, pending verification as to whether the data controller's legitimate reasons prevail over those of the data subject.