

PRIVACY POLICY

Information relating to the personal data processing activities carried out by DNAPhone

WHAT INFORMATION DO WE COLLECT?

DNAPhone collects information in order to manage the activities of:

- sale, rental or loan for use of the Smart Analysis device;
- provision of accessory services, including apps connected to the Smart Analysis device;

some of which have the nature of personal data, that is information that can directly or indirectly identify the Customer or otherwise the user of the service, including by way of example: contact data, registration data, billing data, data relating to user account (name, surname, e-mail, phone number, login credentials, country), interaction data deriving from the use of the device.

DNAPhone also collects information in anonymous, aggregate form and in any case without identification capacity for the purposes of studying and optimizing the services offered, as well as planning and implementing future functions.

HOW DO WE USE YOUR PERSONAL DATA?

The personal data collected and processed by DNAPhone as the data controller concern the following areas:

- A. Management of orders for the Smart Analysis device and / or related services;
- B. Activation and use of services connected to the Smart Analysis device;
- C. Commercial information to customers;
- D. Browsing within the website;
- E. Interactions in social network channels.

Specifically, the processing activities are briefly described below with an indication of the purpose and legal basis:

- A. Order management.** Upon the outcome of each order, the Customer's contact details (including the subjects involved in the pre-contractual and contract execution phase) are processed as necessary for the execution of a contract (Article 6.1 letter b) GDPR) and, subsequently, to fulfill legal obligations (Article 6.1 letter c) GDPR). The data collected and processed in this way are kept for a period of at least 10 years for the fulfillment of the obligations of conservation of accounting records.
- B. Activation and use of related services.** To use the services connected to the Smart Analysis device, including dedicated APPs, it is necessary to download the dedicated APP from the Google PlayStore (with a Google account) and use the mobile device (tablet or Smartphone). Subsequently, create a personal account on the dedicated APP to use the service and related functions, which are activities that can generate additional data attributable to the account. Most of this data will be anonymised and subject to analysis, study and research for improvements and implementations.
 - i. User registration data.** The personal data requested at the time of registration are collected and processed (ie: account connected to the PlayStore, name, surname, login credentials, e-mail, phone number, company name, country) as necessary to execute the contract stipulated with DNAPhone (art.6.1 letter b) GDPR). The duration of the processing of this data follows the life cycle of the user.
 - ii. Usage data.** The personal data generated by the in-app user activity (last connection to the service, geolocation analysis data) are collected and processed on the basis of the legitimate interest of DNAPhone (Article 6.1 letter f) GDPR) to perform analytics and improve the functionality of the app and / or services. The collection of location data takes place only with the user's prior authorization for collection or manual entry and such personal data are processed on the basis of the user's consent (Article 6.1 letter a) GDPR).

- iii. **Interaction data.** All user interaction data with the app and / or with the services offered, through the account created for the service, may be collected on the basis of the legitimate interest of DNAPhone (Article 6.1 letter f) GDPR) to perform analytics and improve the functionality of the app and / or services, with a guarantee for the user to be able to exercise the right to object to such treatments. The duration of the processing of this data follows the life cycle of the user.

C. Data management and user authentication

- i. **Data Management.** The user's personal information, including but not limited to username, first and last name, e-mail address, company name, country, phone number, and other personal data provided during account creation and use of applications connected to the Smart Analysis device, is managed by DNAPhone S.r.l. To ensure data security and privacy, Amazon Web Services (AWS) Cognito, a reliable and secure user management service, is used.
- ii. **Role of AWS Cognito.** AWS Cognito is responsible for managing the authentication and secure storage of user data, including the enrollment, registration, and account access process within applications developed by DNAPhone S.r.l. AWS Cognito ensures the protection of user data using industry-standard encryption and security practices.
- iii. **Data Processing.** While delegating the management and secure storage of data to AWS Cognito, DNAPhone S.r.l. retains ownership and full control of users' personal data and uses it in accordance with the Privacy Policy and applicable regulations. AWS Cognito acts as a data processor on behalf of DNAPhone S.r.l., processing them only according to the instructions received and to the extent necessary for the provision of services.
- iv. **Data Security.** DNAPhone S.r.l. is committed to protecting personal data and using AWS Cognito to implement robust security measures. However, users are responsible for safeguarding their login credentials and timely notification of any unauthorized access to their accounts.
- v. **Contact Information.** If you have any questions or clarifications regarding the management of personal data or AWS Cognito's role in this process, please contact: info@dnaphone.it

D. Commercial information to customers. Commercial communications to subjects who are already customers relate exclusively to DNAPhone's activities and services and are sent to the contact details provided by the same during the stipulation of contracts on the basis of the legitimate interest of the data controller (Article 6.1 lett. f) GDPR and art. 130.4 of the Privacy Code), without prejudice to the right to object at any time to the receipt of such submissions.

E. Browsing within the website. The browsing activity within www.dnaphone.it is defined by the privacy and cookie policy published in the dedicated section of the site.

F. Interactions within the social network channels. The interaction activities through social network channels are defined within the social media policy published on the website www.dnaphone.it

WHO DO WE COMMUNICATE YOUR PERSONAL DATA TO?

The data collected and processed for the activities described may be shared with service providers contractually linked to DNAPhone, abroad or within the European Union, in accordance with the limits set out in art. 44 GDPR in order to comply with contracts or related purposes.

Personal data may be shared with third parties belonging to the following categories:

- subjects that provide services for the management of information systems and telecommunications networks, or ISPs;
- freelancers, firms or companies in the context of consultancy and assistance relationships;
- subjects that provide services for the management of DNAPhone activities, within the limits of necessity and relevance;

- competent authorities for the fulfillment of legal obligations and / or provisions of public bodies, upon request by the same;

The subjects who perform the function of data processing manager are included in an updated list present at the owner's office and bound to the same by an agreement in compliance with the provisions of art. 28 GDPR.

For information relating to the data processing carried out by Google as manager of the PlayStore platform and related services, please refer to: <https://policies.google.com/privacy>

WHAT RIGHTS CAN YOU EXERCISE ON YOUR PERSONAL DATA?

The interested party to whom the personal data processed refer can exercise the rights guaranteed by articles 15 to 21 GDPR by sending a communication to the data controller at the contact details indicated.

- **Access:** the interested party has the right to receive confirmation on the processing activity in progress on their personal data, access to data and relevant information on this activity. Exercisable for the activities referred to in points A, B, C, D, E, F.
- **Rectification:** the interested party has the right to obtain the correction of inaccurate data or the integration of incomplete data. Exercisable for the activities referred to in points A, B, C, D, E, F.
- **Cancellation / oblivion:** the interested party has the right to obtain the cancellation of data concerning him in the event that the conditions set out in art. 17.1 GDPR (e.g. if they are no longer necessary for processing and there is no obligation to keep such data). Exercisable for the activities referred to in points A (with the exception of data for which retention is mandatory by law), B, C, D, E, F.
- **Opposition:** the interested party has the right to oppose the processing based on the legitimate interest of the owner or on a public interest. Exercisable for the activities referred to in points B2, B3 and D (limited to subjects who are already customers).
- **Limitation:** the interested party has the right to obtain the limitation of the processing of data concerning him in the event that the conditions set out in art. 18.1 GDPR, for which the data will only be stored by the owner and processed for some specific cases. Exercisable for the activities referred to in points A, B, C, D, E, F.
- **Portability:** the data subject has the right to receive the personal data provided to a data controller in a structured, commonly used and machine-readable format; transmit such data to another data controller without hindrance by the data controller to whom they were provided if the processing is carried out by automated means and is based either on consent or on the execution of a contract. Exercisable for the activities referred to in point B.
- **Withdrawal of consent:** the interested party has the right to withdraw consent at any time without compromising the lawfulness of the treatments already carried out before the revocation. Exercisable for the activities referred to in point B2 (limited to location data) and D.

UPDATES

The most recent version of this information is made available through publication on the website <https://smart.dnaphone.it/> and in the dedicated APPs linked to the Smart Analysis tool and services.