

Privacy policy

The following information on privacy has the purpose of describing the procedures for the collation and processing of the information required for registration and for the use of the **Ealloora Solutions** (hereinafter the “**Solution/Solutions**“), by means of the application on mobile devices (cell phones, tablets and other electronic devices).

These are standards which regulate the access by the user to the **Ealloora Solutions** irrespective of the means via which they access and should be understood as provided also by way of disclosure pursuant to Article 13 of the European Regulation No. 2016/679, the “GDPR”.

The data controller is Nettrotter S.r.l., with headquarters in Via Zanella 21, Lissone (MB), Italy; VAT No. 09179270963; Company subject to the management and co-ordination of EI Towers S.p.A..

The Data controller has appointed Mr. Cosimo Calabrese as Data Protection Officer.

The data will be processed exclusively by authorised persons (employees, contractors) and by external companies, in complete observance of the privacy legislation.

For any additional information regarding privacy, including the list of the Data supervisors, you can write to the Data controller, at the following address privacy@nettrotter.io.

Information gathered and kept

By means of the **Ealloora Solutions**, the Data controller processes the following information:

Information provided by the user. When the user registers a new account and during the use of the Solution, certain personal information is (and may be) gathered (name, surname, address, telephone number), as well as information deriving from the use of said Solution. This is information which - with the exception of that indicated as optional and that voluntarily communicated by the user - is required and subsequently processed so as to permit the fruition of the Solutions, which would not otherwise be possible to activate.

Registration data. When the user uses the Solutions, information on their device is automatically registered. This information may include the IP (Internet Protocol) address of the device, the type of browser, the preferences of the settings, the identification numbers associated with the devices, the information on the configuration of the system, the metadata with the files and the other interaction with the Solution.

Cookies. In order to gather the information and improve the Solutions, “cookies” are used. A cookie is a data file of reduced dimension which is transferred to the device of the user. “Permanent cookies” can be used to save the registration ID and the access password for future access to the Solution. “Session identification cookies” can be used to active certain functions of the Solution, to more fully understand the interaction of the user with the Solution and to monitor the aggregate use and the addressing of the web traffic within the Solution. These are technical cookies necessary for the functioning of the Solutions.

Purpose of the processing and legal basis of the processing

The personal data provided by the user and acquired during the use of the Solutions, will be processed - without the necessary express consent of the data subject and in compliance with Article 6, letter b of the GDPR - for the following purposes:

- a. providing and improving the Solutions;
- b. managing the use of the Solutions by the user;
- c. sending service communications, also with reference to content changes, contractual terms, conditions and policies applied;
- d. fulfilling any precontractual, contractual and tax obligations.

The personal data provided by the user and acquired during the use of the Solution, will be processed - without the necessary express consent of the data subject and in compliance with Article 6, letter c of the GDPR - for the following purposes:

- a. fulfilling the obligations deriving from the law, regulations, other EU legislation or an order of the Authority;
- b. preventing fraud or abuse to the detriment of **Ealloora** or its users;
- c. protecting the property rights of **Ealloora**;
- d. permitting the Data controller to exercise any other rights, such as the right to defend itself before the courts, as well as any other processing compatible with the purposes listed above.

In compliance with Article 6, letter a. of the GDPR, the same data will by contrast be processed only subject to the free and specific consent of the data subject - manifested by means of ticking the dedicated box and which can be revoked at any time - for the pursuit of promotional and commercial ends, for sending information to users, including personalised, on the activities and the services of the Company, via newsletter or other promotional instruments.

Additional information can be gathered (personally or by means of third party services) using registers and cookies and correlating them, if strictly necessary, with the personal information of the users. This information is used for the purposes indicated previously and to monitor and analyse the use of the Solution, for the technical administration of the Solutions, to improve the functioning and the ease of use of the Solutions and to check that the users have the necessary authorisations so that **Ealloora** processes the requests. At the time of the applicability of these provisions, the provider used for these activities is Google Analytics.

Processing location

The processing of the data provided by means of registration and use of the Solutions is carried out using automated instruments, is handled technically by the supplier of the hosting infrastructure of Nettrotter, Farport Software S.r.l., and is housed on two Google cloud services known as "GOOGLE SQL" and "Firebase Authentication".

The processing of the data by the Data Controller is carried out in compliance with the provisions of EU Regulation 2016/679, according to suitable protection standards.

Disclosure of data

The personal data of the user, for the sole purpose of providing the Solutions and guaranteeing the security and protection of the data, is transferred to companies of the EI Towers Group, to Partner companies of Nettrotter, to the Company which distributes the Nettrotter solutions online, and to the Company which manages the hosting infrastructure for Nettrotter. These companies ensure a suitable protection of the data subjects with regard to the processing of their personal data.

The data can also be communicated to other parties, public and/or private, when the communication is envisaged or mandatory by law.

Duration of the data processing

The personal data will be processed for the period of time necessary for achieving the purposes for which it was collated.

It is therefore specified that:

- the data necessary for the functioning of the **Ealloora** app will be kept for the entire period of use of the app and existence of the account of each user;
- the data used for commercial and promotional purposes will be kept for the entire duration of the services included in the Ealloora Solutions (up to 3 years) plus an additional period of six months for any upselling after the expiry of the Solution.

In any event, a longer conservation period may apply, if required by legal or regulatory provisions.

Rights of the data subjects

Pursuant to Articles 13, 15-22 of the GDPR, the data subject in particular has the right:

- to obtain confirmation as to whether or not personal data concerning him or her is being processed;
- to obtain access to the data and the following information (purpose of the processing, categories of personal data, recipients and/or categories of recipients, period of conservation);
- to obtain the rectification or integration of inaccurate personal data concerning him or her;
- to obtain the cancellation of personal data concerning him or her in the cases envisaged by Article 17 of the GDPR;
- to withdraw their consent to the processing, without prejudicing the lawfulness of processing based on consent before its withdrawal;
- to make sure that the personal data concerning him or her is only kept without it being used in any other way in the following cases envisaged by Article 18 of the GDPR;

- to receive the personal data which concerns him or her processed on an automated basis, in commonly used form, legible by means of automatic and interoperable device, if said data is processed by virtue of a contract or on the basis of their consent.

With regard to any request or communication, or to exercise your rights, you can contact the Data controller by sending an e-mail to: **privacy@nettrotter.io**.

Amendments to this disclosure

Nettrotter S.r.l. reserves itself the faculty to up-date this disclosure at any time. Therefore, you are advised to periodically check the same, for the purpose of being up-to-date on the Company's privacy policy. In the event of substantial changes to the policy, a notice will be sent with detailed information.