

## INFORMATION PURSUANT TO ART. 13 OF THE GENERAL DATA PROTECTION REGULATION (EU) 2016/679 (GDPR)

This document (hereinafter referred to as Policy) has been prepared to inform you, the User (hereinafter also referred to as "Account" or "Interested party"), of how Ferroli S.p.A. (hereinafter also referred to as "the Company") will use your personal information if you use the "CONNECT" application (hereinafter also referred to as "App").

The information and data provided by you or otherwise acquired during the use of the application will be processed in accordance with the provisions of the GDPR and with the confidentiality obligations that inspire the Company.

This Policy refers exclusively to the application.

The application was created and developed by Third Parties on behalf of Ferroli S.p.A.

Ferroli S.p.A. is the owner of the rights and manages the application.

Ferroli S.p.A. uses the application according to a contract with Third Parties.

### **Data Controller**

The Data Controller of the application is Ferroli S.p.A. in the person of the pro-tempore Legal Representative, with registered office at Via Ritonda 78/a - 37047 San Bonifacio (VR) Tax Code - VAT No. 02096470238.

### **Purpose and legal basis of the processing, type of data processed**

The data will be used to manage the following operations of the heating products (hereinafter referred to as "appliance" or "device") via a remote device (smartphone/tablet):

- Turn on and switch off the appliance;
- Set room temperature;
- Set time bands operation;
- Set system water temperature;
- Report the alarm codes in the event of a failure.

The application also informs the user of the operating status of the appliance in real time.

The data required for the complete and correct operation of the application are:

#### Data provided voluntarily by the Interested Party:

- Email address (mandatory data);
- Password (mandatory data);
- Device name chosen by the User (optional data);
- Place of installation of the device, rooms where the devices are installed (optional data);
- Identification of the geographical position of the place of installation of the device selected by the User (optional data);
- Profile picture (optional data).

#### Data acquired automatically by the application/service:

- Identification of the remote portable device (mandatory data);
- Virtual identification of the device, automatically assigned by the server (mandatory data);
- IP address (Internet Protocol) of the device (mandatory data);
- MAC address (Media Access Control) of the device (mandatory data);
- Device time zone (mandatory data);
- Device serial number and model for after-sale support (optional data)
- Contact information of the User for sending feedback / suggestions (optional data)
- Log register, for troubleshooting (optional data).

By installing this application, you consent to the collection of data for the above mentioned processing.

### **Collection and transmission of personal data**

The services provided by the application, as well as its characteristics and functionalities, require a simplified registration of the User by entering some personal data, in particular email address and a password defined by the same.

To guarantee access security, the application automatically detects the identification of the remote device, the email address and the place of installation of the device.

To be able to work, the application requires all the data indicated above, partly provided voluntarily by the Interested Party and partly acquired automatically by the application/server.

Other data may be collected by the application distribution service provider, in particular the Apple App Store and the Google Play Store.

For further information, the Interested Party can visit the websites of the providers to learn more about their privacy policies.

#### **QR Code reader**

The application has a QR Code reading feature, through the use of the phone's camera.

This feature is used exclusively to make it easier to identify and add the device to the application.

#### **How the data is processed and how long it is kept**

The data is processed in accordance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to art. 5 of the GDPR; the personal data collected will be kept for the period of time necessary to achieve the purposes for which it is collected and it will be processed in accordance with applicable regulations.

The data is processed on behalf of the Data Controller by a Third Part Company in charge of the rights of use and management of the application.

The Data Controller has therefore made specific agreements with the supplier aimed at ensuring:

- The security and protection of the data processed;
- The adoption of organisational and technical measures that prevent the loss of data and/or its dissemination.

Personal data will be deleted: i) at the request of the User (ref. "Rights of the Interested Party"); ii) if the interested party does not access to the App for a continuous period of at least one year from the last access. In particular, the data will be deleted one month later the expiry of the aforementioned term.

#### **Place of data processing**

The data is processed within the European Union.

#### **Communication to third parties**

The data, in the cases provided for by law, by regulations or to carry out activities connected with the institutional purposes of the Company, may be communicated to third parties such as, by way of example and not limited to:

- Public Security and/or Judicial Authority;
- Control bodies of the Company (e.g. Board of Statutory Auditors, Supervisory Board);
- Technological service providers and subjects that provide device after-sale support.

#### **Advertising**

The application does not feature advertisements.

#### **Rights of the Interested Party**

Pursuant to art. 15 and following of the GDPR, the Interested Party can exercise the rights provided for by the GDPR at any time and in particular:

- Request the confirmation of the existence of their personal data;
- Request access to their personal data, rectify or delete it or refuse its processing;
- Request the limitation of processing in the cases provided for by art. 18 of the GDPR, as well as obtain the data in a structured format, commonly used and readable by an automatic device, in the cases provided for by art. 20 of the GDPR;
- Obtain information on the purposes of data processing, the categories of personal data, the retention period;
- Submit a complaint to a competent Supervisory Authority (Data Protection Authority), pursuant to art. 77 of the GDPR, if it is believed that the processing of their personal data is contrary to the legislation in force.

The Interested Party can exercise their rights with a written request sent to the attention of the Privacy Department of Ferroli S.p.A. to the postal address of the registered office or to the email address: [privacy@ferroli.com](mailto:privacy@ferroli.com)

**SPECIFIC APPROVAL OF CLAUSES OF THE SERVICE CONTRACT FOR THE APP**

Pursuant to and for the purposes of articles 1341 of the Italian Civil Code, the User declares to specifically approve the clauses of the service contract for the App referred to in points: V.5.2. right to suspend or terminate the contract; VIII.8.1-8.2-8.3 limitations of liability, right to suspend or terminate the contract; IX termination and breach of the Contract; X. applicable law and competent Courthouse.