

**Icona
Privacy policy App
Acty
Release 1.0**



Information on the processing of personal data

Within the meaning of Art. 13 of Legislative Decree No 196 of 30.6.2003 and Art. 13 of Regulation (EU) 679/2016

This privacy statement - drafted pursuant to Article 13 of Legislative Decree No 196 of 30 June 2003, ("Privacy Code") and Art. 13 of Reg. (EU) No. 2016/679 ("GDPR") - regulates the personal data processing carried out by the Data Controller via the "ACTY" Mobile Phone Application (hereinafter referred to also only as the "APP"); and describes the purposes of and procedures used for the processing of the personal data of the Users who download, install and use the APP.

This privacy statement is provided exclusively for the App and for any data processing carried out by Icona but not for data processing carried out by third party customers of ICONA Srl, who provide support through the APP. Each Customer company will provide the User with its own privacy statement on its personal data processing.

To complete the installation of the APP, the User must read, understand and accept all the contents of this Privacy Policy.

This privacy statement may be subject to updates without prior warning: by downloading, installing and using the APP, the User fully and automatically accepts the variations.

Definitions

The "Data Controller" is the company ICONA SRL, represented by its pro tempore legal representative, with registered office in Cinisello Balsamo (MI) in Viale Brianza 20, Tax Code 01110530191, VAT Number IT02812760961 (hereinafter also referred to for the sake of brevity as "ICONA" or the "Data Controller" or the "Company").

The "Users" are the natural persons to whom the personal data processed by the Data Controller refer (hereinafter also referred to for the sake of brevity as the "Users" or "Data Subjects"); who download, install and use the APP, developed and created by ICONA for Android and IOS operating systems, which allows the User to use the software named "ACTY".

The Customer/Licensee is a company or individual who has signed a user licence agreement with ICONA Srl for the ACTY software and provides the remote technical support requested by the User via the APP.

“ACTY MOBILE” is the Mobile Application of the remote video support platform created by ICONA.

The APP can be used (i) in "Master" mode by the Customer/Licensee, in order to provide remote support, with the credentials obtained by virtue of the license agreement for the software, and/or (ii) in "slave" mode by the final customer, in order to request remote support.

The APP is provided by ICONA to the interested Users by way of a free user licence.

Nature of the data processed and user registration

The User who downloads the APP must register to use the APP and associated services. Registration is free of charge and confidential and can only be performed by adults.

The User must provide the Data Controller with truthful data and keep them updated, under their own sole responsibility.

By registering, the User authorizes ICONA to process and use their personal data, conferred at the time of registration, in order to favor and facilitate the User's access to the APP, also enabling them not to have to register again each time they enter the APP.

The User undertakes to keep the information about their Account (User-Id) and the password for accessing the APP confidential, and will be the only partly responsible for all activities carried out using their Account.

The User of the APP can access the service both as a “Registered User” and as an “Anonymous User” via the following procedures:

Purposes of the processing

The personal data communicated by the Users who download, install and use the APP will be processed by the Data Controller for the following purposes:

- a) To fulfil the request for remote technical support made by the User via the APP. ICONA will communicate the User's data to the Customer/Licensee for the purpose of authorizing the latter to provide the remote support service requested by the User. The Parties agree that, should the User fail to authorize the communication of their data to the Customer/Licensee, it will not be possible for the Customer/Licensee to provide the remote technical support service requested by the User.
- b) To allow the Customer/Licensee to provide, through the app, the technical support requested by the end customer.
- c) To enable the Data Controller to carry out operations which are closely connected and instrumental to the correct management of the relations with

the Users, to the provision of the services requested by the above-mentioned Users, also with regard to the functioning and correct use of the APP;

- d) To perform statistical analyses in an anonymous and aggregated form;
- e) To fulfil the obligations of the laws or regulations in force;
- f) To manage any complaints and enable the Data Controller to protect its rights.

It is not mandatory for the User to confer their data when registering, but failure to do so could prevent the Customer/Licensee from providing the requested support service.

In any case, at any time following registration, the User can revoke the consent granted by sending a simple written request addressed to the Data Controller.

Processing procedures

The data will be processed lawfully, according to the principles of correctness and in compliance with those of necessity, relevance, completeness and minimization, in relation to the purposes for which they are processed.

The Data Controller shall process the data of the User mainly by electronic means suitable for guaranteeing, in relation to the purposes for which the data have been collected, the safety and confidentiality of the same, and to prevent unauthorized access to the data, for a period of time not exceeding that necessary for the purposes indicated above.

The Users' data which has been submitted to ICONA when filling in the APP Registration form, will be kept by the Data Controller for a period of time not exceeding 5 (five) years from the date on which the APP is last used, for the purposes described above, and subsequently for the period of time which Icona is subject to retention obligations for tax purposes, and any other purposes provided for by the law or regulations.

The data pertaining to the support activities ("Support History") will be stored by the Data Controller in Cloud mode managed by the Acty service for a period not exceeding 2 (two) years, also to enable statistical analyses to be performed in anonymous and aggregated form.

In order to pursue the purposes indicated above, the Data Controller may also need to communicate the personal data of the User to third parties belonging, by way of example only, to the following categories: parent and subsidiary companies; parties that perform technical and IT duties on behalf of ICONA; parties that provide services for the management of the information system of ICONA; parties that perform customer support activities (e.g. call centers, etc.); parties that perform filing and data entry activities; professional studios and companies in the field of consultancy and support relationships; parties that perform market research upon appointment from ICONA. The parties belonging to the categories reported above will process the Users'

data as Data Supervisors, appointed specifically for this purpose by the Data Controller. The list of the third parties to which the Data Controller will communicate the personal data of the Users is available for consultation by the User at the registered office of the Data Controller, or by writing to the following email address: **legal@icona.it**.

The personal data processed for the purposes indicated above are not subject to disclosure, nor to any fully automated decision-making process.

Data processed by Icona's customers/licensees

The User, by downloading, installing and using the APP, explicitly authorizes the Customer/Licensee companies of ICONA, who have purchased the user license for the ACTY software, to use the camera of their mobile device as a video camera, only for the purpose of providing the technical support requested from time to time via the APP.

The User, by downloading, installing and using the APP, explicitly accepts that the video camera will be controlled remotely by the operator of the selected Customer, who will only have access to the video camera for the time necessary to provide the technical support or maintenance service requested by the User, and will have absolutely no possibility of accessing other functions or contents of the mobile device belonging to the User. The Customer/Licensee and their operator will only have access to photographs and video recordings made in compliance with and execution of the support or maintenance service requested by the User.

The express written request on the part of the user, the Customer/Licensee may have access to the Gallery of the mobile device.

The User, by downloading, installing and using the APP, explicitly authorizes ICONA, on behalf of the Customer/Licensee, to store, in cloud mode managed by the Acty service, the photographs and video recordings taken and made by the Customer's operator during the support session and the photographs and video-recordings acquired (at the express request of the user) from the Gallery of the mobile device, in order to allow the Customer/Licensee to provide the service requested. Indeed, the Customer's operator must create a personalized support form for the User, also containing the photographs and video recordings.

ICONA will be able to access the data stored on the Acty Cloud for the sole and exclusive purpose of archive maintaining and problem solving. The access to Acty Cloud is limited to ICONA employees with a hardware access key provided by the company.

Concerning the purposes and procedures of the processing and the times for storing the User's data by the Customer/Licensee which provides the remote support service requested by the User, the above-mentioned Customer/Licensee, as an autonomous Data Controller, is responsible and obliged to provide the User with the privacy

statement pursuant to Article 13 of Legislative Decree No 196 of 30 June 2003 and Article 13 of Regulation (EU) 679/2016.

Rights of the data subject

Each User may exercise, by simple written request to be sent to the Data Controller, all rights conferred on it by the GDPR; by way of example but not limited to:

- a) The right of access to one's own personal data, to obtain confirmation of their existence care of the Data Controller, to know their origin and the purposes and procedures of the relative processing;
- b) The right to know the data which identifies the Data Controller and any Data Supervisors and DPO, where appointed;
- c) The right to know the parties or categories of parties to which the personal data have been communicated;
- d) The right to obtain rectification of inaccurate data or the completion of incomplete data; deletion of personal data that concern them (upon the occurrence of any of the conditions specified in art. 17, paragraph 1 of the GDPR and in accordance with the exceptions provided for in paragraph 3 of the same article); the limitation of processing of their personal data (to have recourse to one of the hypotheses indicated in art. 18, paragraph 1 of the GDPR);
- e) The right to request and obtain from the Data Controller - in cases in which the legal basis for the data processing is the agreement or the consent, and the same is performed by automated means - one's own personal data in a structured and legible format by the automatic device, also in order to communicate these data to another Data Controller (the so-called right of portability of personal data);
- f) The right to object to the processing of one's data for legitimate reasons;
- g) Requests must be sent in writing to the company ICON SRL, at its unit located at Viale Brianza, 20 20092 Cinisello Balsamo (MI).

Cookies

Cookies are small text files that the websites visited by the User send to their browser, where they are temporarily memorised.

Regarding the types of cookies used by the company ICONA Srl on the www.acty.com site, and in order to acquire any additional information about these, full reference should be made to the Cookies Policy available at https://www.acty.com/it/docs/Cookie_sito_EN.pdf

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