

## PRIVACY POLICY PURSUANT TO ARTICLES 13 and 14 OF REGULATION (EU) 2016/679 (“GDPR”)

**Dear Customer,**

In accordance with articles 13 and 14 of EU Regulation No. 2016/679 on the protection of natural persons with regard to the processing of personal data (hereinafter referred to as “GDPR”), this Privacy Policy provides you with information on the processing of your personal data in relation to the use of the BTicino App “Door Entry”.

### **DATA CONTROLLER**

BTicino S.p.A.  
Viale Borri, 231  
21100 Varese - Italy  
Fax: +39 0332 423675  
E-mail: [privacy@pec.bticino.it](mailto:privacy@pec.bticino.it)

### **DATA PROTECTION OFFICER (DPO)**

E-mail: [dpo@pec.bticino.it](mailto:dpo@pec.bticino.it)

### **PERSONAL DATA WE PROCESS**

The personal data in the possession of BTicino S.p.A., Data Controller, are:

1. provided by you or learnt by us during the performance of contractual activities;
2. acquired from third parties;
3. acquired from data banks of publicly accessible data.

#### ***Data collected during app use***

During their normal operation, the computer systems and software procedures that are involved in the functioning of this app acquire certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected for the purpose of being associated with any identified data subjects but, because of its nature, could, if processed and combined with other data held by third parties, lead to the identification of the concerned data subjects.

These data include IP address, unique device identifier (UDID, UID), operating system installed on the device, model and make of the device, technical details that can help identifying errors, as well as data relating to network connectivity and the applications running on the device.

These data are collected via the “Google Analytics” service and are used for the sole purpose of obtaining anonymous statistical information on app use and check if the app is functioning correctly. These data are stored for 50 months. The data subject may disable collection of data by “Google Analytics” at any time by accessing the account menu through your smartphone. For comprehensive details on operation, please view the related information as published by Google on its official website.

#### ***Data provided directly by the user***

**Vers. 11.0 of February 1<sup>st</sup>, 2020**

In order to be able to use the service via the app, you will be requested to provide the following personal data: name, surname, e-mail address, password.

Provision of said registration data is mandatory. A failure to provide registration data makes it impossible to register and use the app.

#### ***Anonymous and aggregate statistical information on app use***

This app uses Google Analytics to collect anonymous and aggregate statistical information on app use by users.

#### ***Push notifications***

This app may send both service-related push notifications and, subject to consent, “commercial” push notifications.

If enabled, notifications may be sent when the app is active.

Push notifications may be disabled by accessing the push notifications section in the operating system running on the device (Android or iOS). The choice to disable push notifications is not irreversible.

#### **PURPOSES OF PROCESSING – LEGAL GROUNDS – STORAGE PERIODS**

Personal data are processed as part of BTicino S.p.A.’s regular activities for the following purposes:

1. To register the app;  
Legal basis for processing: performance of a contract to which you are a party;  
Storage period: until cancellation of app registration.
2. To enable use of app services:
  - technical management of the app;
  - analysis of errors generated by the app;
  - use of app functions;
  - sending of service-related push notifications;Legal basis for processing: performance of a contract to which you are a party;  
Storage period: until cancellation of app registration.
3. To send commercial, advertising or promotional communications regarding the products/services offered by the Company via automated means (e.g.: e-mail, text message, etc.) or traditional means (e.g.: operator telephone call). Personal data may also be processed to measure the level of your satisfaction on the quality of the services supplied and the activities conducted by BTicino S.p.A.;  
Legal basis for processing: your consent at the time of registration;  
Storage period: until withdrawal of consent.
4. To analyse your preferences/interests for the purpose of offering personalised content in the app or via push notifications;  
Legal basis for processing: your consent at the time of registration;  
Storage period: until withdrawal of consent, except for details regarding app use which will be stored, in any case, for a maximum of 24 months from recording.
5. To collect data anonymously via Google Analytics, for the purpose of improving the services offered;  
Legal basis for processing: your consent. Consent may be changed directly from the app;  
Storage period: 50 months.

**Vers. 11.0 of February 1<sup>st</sup>, 2020**

Once the above storage periods have elapsed, personal data will be destroyed, erased or anonymised, compatibly with technical erasure and backup procedures.

#### **MANDATORY/VOLUNTARY NATURE OF DATA PROVISION**

Provision of the data for the purposes under items (1) and (2) is mandatory. Failure to provide the data makes it impossible to register the app and use the related services.

Provision of the data is voluntary for all other purposes. Failure to provide the data does not affect the app functions.

#### **AUTHORISED PERSONS AND DATA RECIPIENTS**

The data may be processed by employees in the company departments responsible for pursuing the above purposes who have been expressly authorised to process the data and have received adequate operating instructions from the Controller.

Your data may also be processed by other companies - including companies that are part of the Legrand Group – who conduct specific activities on our behalf, including, without limitation, technical management and maintenance of the system on which the data are stored, user database hosting services, provision of registration and authentication procedures. These companies are designated as Data Processors under Article 28 GDPR. A detailed list of these companies is available from our offices.

Your data may also be disclosed to external parties acting as Data Controllers, including, without limitation, supervisory and monitoring bodies and authorities and/or public and private entities in general who are entitled to request disclosure of your data.

The data will not be transferred to countries that are not member states of the European Union.

#### **RIGHTS OF THE DATA SUBJECT AS PER CHAPTER III GDPR**

With regard to the processing of your personal data, you shall have the right:

- to request from the Controller access to the data concerning you (article 15 GDPR);
- to request from the Controller rectification and completion of any incomplete data (article 16 GDPR);
- to request from the Controller erasure of the data (article 17 GDPR);
- to request from the Controller restriction of processing (article 18 GDPR);
- to object to processing in cases where the Controller has legitimate grounds (article 21 GDPR);
- to receive the data in a structured, commonly used and machine-readable format and, if technically feasible, to transmit those data to another controller without hindrance (“Right to data portability”, article 20 GDPR);
- to withdraw consent at any time (article 7 GDPR).

Please be also informed that you have a right to lodge a complaint with the competent supervisory authority (article 13 GDPR).

The above rights may be exercised by sending a written notice to the address below or an email to: [privacy@pec.bticino.com](mailto:privacy@pec.bticino.com).

#### **Vers. 11.0 of February 1<sup>st</sup>, 2020**