

Privacy Policy of the mobile app E4Life



Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of Italy



Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of United Arab Emirates



Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of Saudi Arabia



Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of Morocco



Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of Singapore



Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of Australia



Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of New Zealand



Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of Japan

Informativa dell'applicazione E4Life



Informativa dell'applicazione e4life con riferimento al trattamento dei dati personali degli utenti che effettuano il download, accedono e utilizzano l'applicazione nel territorio italiano



Informativa dell'Applicazione E4Life con riferimento al trattamento dei dati personali degli utenti che effettuano il download, accedono e utilizzano l'Applicazione nel territorio degli Emirati Arabi Uniti



Informativa dell'Applicazione E4Life con riferimento al trattamento dei dati personali degli utenti che effettuano il download, accedono e utilizzano l'Applicazione nel territorio dell'Arabia Saudita

تذكرة الإعلام		الخاصة		طبقة		E4Life	
	الملكية الإعلانية	ملكية	ملكية	ملكية	ملكية	ملكية	ملكية
	الملكية الإعلانية	ملكية	ملكية	ملكية	ملكية	ملكية	ملكية
	الملكية الإعلانية	ملكية	ملكية	ملكية	ملكية	ملكية	ملكية

Politique de confidentialité de l'application mobile E4Life



[Politique de confidentialité de l'application mobile E4Life, concernant le traitement des données personnelles des personnes concernées qui téléchargent, accèdent et utilisent l'application sur le territoire du Maroc. qui téléchargent, accèdent et utilisent l'application sur le territoire du Maroc](#)

E4Life APP プライバシーポリシー（日本）



[アプリをダウンロード、アクセス、利用するデータ主体の日本国内でアプリをダウンロード、アクセス、使用するデータ主体の個人データの処理に関するモバイルアプリ E4Lifeのプライバシーポリシー](#)

Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of Italy



The following information is provided in accordance with Articles 13 and 14 of the EU Regulation 2016/679 ("GDPR"), concerning the processing of personal data of data subjects/users (hereinafter referred to as "Users" or singularly the "User") who download, access, and use the mobile app "E4Life" (hereinafter "APP").

Users are urged to carefully read this Notice before installing the APP and/or registering on the APP.

1. DATA CONTROLLER

Please be informed that the data controller is the company ELETTRONICA S.p.A. (VAT Number 00886951003 with registered office at via Tiburtina, Valeria km 13,700, Rome, (hereinafter referred to as "Elt" or the "Data Controller") email: privacy@e4.life. The complete list of data processing managers is available upon written request sent to the email address above.

2. COLLECTED PERSONAL DATA

Elt processes data provided by Users, in accordance with this Notice.

Specifically, for the purposes indicated in Article 3, the following data will be processed: (i) user's name and surname, (ii) email, (iii) e4life device identifier.

The mentioned data is processed only to the extent necessary to achieve the purposes described in paragraph 3 of this Notice.

Personal data is provided by the User during registration. Failure to provide them prevents User registration.

3. PURPOSES OF PROCESSING

The purposes for which Users are asked to provide their personal data to Elt are as follows:

- a) Allow the User to register on the APP;
- b) Update the firmware of the device;
- c) Send communications related to the operation and update of the device, as well as new features and/or services associated with it (via email or push notifications, if allowed by the User);
- d) Monitor and analyze data on the use of the APP.

4. LEGAL BASIS OF PROCESSING

The Data Controller processes the personal data of the User under the following conditions:

- a) For the purposes indicated in Article 3 preceding, letters a) to c), as necessary for access to the APP and for the use of the firmware update service through the APP (Art. 6, paragraph 1, letter b), GDPR).

- b) For the purposes indicated in Article 3 preceding, letter d), to pursue the legitimate interest of the Data Controller (Art. 6, letter f), GDPR).

5. PROCESSING METHODS

User personal data is processed with the support of computerized means and is protected through adequate security measures suitable for ensuring confidentiality and security.

In particular, Elt adopts appropriate organizational and technical measures to protect the personal data in its possession, aimed at preventing unauthorized access, disclosure, alteration, loss, and destruction of such data.

6. SCOPE OF DATA COMMUNICATION AND DISCLOSURE

For the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the "Elettronica Group" in Italy and abroad, both nationally and internationally, as detailed in Section 7 below.

User personal data will not be disclosed to undetermined parties other than those mentioned above.

7. NON-EU DATA PROCESSING

To achieve the purposes outlined in this Notice, personal data may be transferred outside the national territory to countries located within the European Union or to entities located outside the European Economic Area ("EEA").

The potential transfer of User personal data to countries outside the EEA will, in any case, occur in compliance with applicable laws, without prejudice to the rights of the User as provided by law.

Where applicable, Elt will use data protection safeguards provided by Articles 46 and following of the GDPR, such as, for example, standard contractual clauses. In other cases, the transfer of personal data may be based on an adequacy decision under Article 45 of the GDPR. The User can obtain a copy of the safeguards implemented by Elt, approved by competent authorities, by sending a specific request to the address privacy@e4.life.

8. DATA RETENTION PERIOD

Elt will retain personal data for the period necessary to fulfill the purposes for which they were collected, as outlined in this Notice.

To determine the most appropriate retention periods for User personal data, Elt has taken into consideration, among other factors, the quantity, nature, and sensitivity of the personal data and the reasons for which they were collected. For example:

- Data collected for purposes a), b), c) in Article 3 above will be retained until the deletion of the profile, which can be done by uninstalling the App or by sending a written request to the email address privacy@e4.life, unless legitimate reasons require further retention.
- Data collected for purpose d) in Article 3 above is associated with the device ID and, once the profile data is deleted (disconnecting the link to the user-device), is retained permanently as it is no longer attributable to an user.

9. DATA SUBJECTS RIGHTS

The User may, at any time, exercise the rights provided in Articles 15-22 of the GDPR, including: access to personal data, request rectification and/or deletion of information we hold/process about you, object to the processing of your data, request a copy of the information we hold/process about you, withdraw consent to the processing of your information (to the extent that such processing is based on consent), obtain restriction of the processing of your data by us, request that the personal data you provided to us be transferred to you or to third parties in machine-readable formats, and request data portability.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the User to verify his identity and provide information to help Elt better understand the request.

The User also has the right to lodge a complaint with the Supervisory Authority (in Italy, it is the Italian Data Protection Authority) with registered office at Piazza Venezia 11, Rome (00187) and email protocollo@gpdp.it.

The User can exercise the above rights, change contact preferences, notify Elt of any updates to their data, request profile deletion, or obtain further information about Elt's use of their personal data by contacting Elt at the email address privacy@e4.life.

10. CHANGES AND UPDATES

This Notice is effective from the date of its publication on the APP. Elt may make changes and/or additions to it, also as a result of any subsequent legislative changes and/or additions. The latest version of our Notice is always available in the dedicated section on the APP.

ELETTRONICA S.p.A.

Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of UAE



The following information is provided in accordance with the Federal Decree by Law No. (45) of 2021 Concerning the Protection of Personal Data (hereinafter "the Decree"), concerning the processing of personal data of data subjects/users (hereinafter referred to as "Users" or singularly the "User") who download, access, and use the mobile app "E4Life" (hereinafter "APP").

Users are urged to carefully read this Notice before installing the APP and/or registering on the APP.

1. DATA CONTROLLER

Please be informed that the data controller is the company ELETTRONICA S.p.A. (VAT Number 00886951003 with registered office at via Tiburtina, Valeria km 13,700, Rome, (hereinafter referred to as "Elt" or the "Data Controller") email: privacy@e4.life. The complete list of data processing managers is available upon written request sent to the email address above.

2. COLLECTED PERSONAL DATA

Elt processes data provided by Users, in accordance with this Notice.

Specifically, for the purposes indicated in Article 3, the following data will be processed: (i) user's name and surname, (ii) email, (iii) e4life device identifier.

The mentioned data is processed only to the extent necessary to achieve the purposes described in paragraph 3 of this Notice.

Personal data is provided by the User during registration. Failure to provide them prevents User registration.

3. PURPOSES OF PROCESSING

The purposes for which Users are asked to provide their personal data to Elt are as follows:

- a. Allow the User to register on the APP;
- b. Update the firmware of the device;
- c. Send communications related to the operation and update of the device, as well as new features and/or services associated with it (via email or push notifications, if allowed by the User);
- d. Monitor and analyze data on the use of the device/APP, in order to resolve errors and/or improve and evolve the service in favor of the User's experience.

4. LEGAL BASIS OF PROCESSING

The Data Controller processes the personal data of the User under the following conditions: For the purposes indicated in Article 3 preceding, letters a) to d), as necessary for access to the APP and for the use of the firmware update service through the APP (Art. 4, paragraph 9 of the Decree).

5. PROCESSING METHODS

User personal data is processed with the support of computerized means and is protected through adequate security measures suitable for ensuring confidentiality and security.

In particular, Elt adopts appropriate organizational and technical measures to protect the personal data in its possession, aimed at preventing unauthorized access, disclosure, alteration, loss, and destruction of such data.

6. SCOPE OF DATA COMMUNICATION AND DISCLOSURE

For the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the “Elettronica Group” in UAE, Italy and abroad, both nationally and internationally, as detailed in Section 7 below.

User personal data will not be disclosed to undetermined parties other than those mentioned above.

7. PROCESSING OF PERSONAL DATA OUTSIDE UAE

To achieve the purposes outlined in this Notice, personal data may be transferred outside the national territory to countries or to entities located outside UAE.

The potential transfer of User personal data to countries outside UAE will, in any case, occur in compliance with applicable laws, without prejudice to the rights of the User as provided by law.

Where applicable, Elt will use data protection safeguards provided by Article 23 of the Decree. In other cases, the transfer of personal data may be based on an adequacy decision under Article 22 of the Decree. The User can obtain a copy of the safeguards implemented by Elt, approved by competent authorities, by sending a specific request to the address privacy@e4.life.

8. DATA RETENTION PERIOD

Elt will retain personal data for the period necessary to fulfill the purposes for which they were collected, as outlined in this Notice.

To determine the most appropriate retention periods for User personal data, Elt has taken into consideration, among other factors, the quantity, nature, and sensitivity of the personal data and the reasons for which they were collected. For example:

- Data collected for purposes a), b), c) in Article 3 above will be retained until the deletion of the profile, which can be done by uninstalling the App or by sending a written request to the email address privacy@e4.life, unless legitimate reasons require further retention.
- Data collected for purpose d) in Article 3 above is associated with the device ID and, once the profile data is deleted (disconnecting the link to the user-device), is retained permanently as it is no longer attributable to an user.

9. DATA SUBJECTS RIGHTS

The User may, at any time, exercise the rights in accordance with the provisions of the Decree, including: access to personal data, request rectification and/or deletion of information we hold/process about you, object to the processing of your data, request a copy of the information we hold/process about you, withdraw consent to the processing of your information (to the extent that such processing is based on consent), obtain restriction of the processing of your data by us, request that the personal data you provided to us be transferred to you or to third parties in machine-readable formats, and request data portability.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the User to verify his identity and provide information to help Elt better understand the request.

If you wish to exercise the above rights, change contact preferences, notify Elt of any updates to their data, request profile deletion, or obtain further information about Elt's use of your personal data please contact Elt at the email address privacy@e4.life.

Otherwise, to protect your rights, you can contact, in Abu Dhabi, "the Commissioner of Data Protection of the Abu Dhabi Global Market" to the email dpo@adgm.com or, in Dubai, "the Commissioner of Data Protection" to the email commissioner@dp.difc.ae.

10. CHANGES AND UPDATES

This Notice is effective from the date of its publication on the APP. Elt may make changes and/or additions to it, also as a result of any subsequent legislative changes and/or additions. The latest version of our Notice is always available in the dedicated section on the APP.

ELETTRONICA S.p.A.

Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of Saudi Arabia



The following information is provided in accordance with Article 4, paragraph 1, of the Personal Data Protection Law issued by Royal Decree No. (M/19) dated 16/9/2021 and its subsequent amendments ("PDPL ") as well as Article 4 of the Implementing Regulations which came into force on 6/9/2023 ("the Implementing Regulations") and the Personal Data Transfer Regulations which came into force on 6/9/2023 ("the Data Transfer Regulations"), concerning the processing of personal data of data subjects/users (hereinafter referred to as "Users" or singularly the "User") who download, access, and use the mobile app "E4Life" (hereinafter "APP").

Users are urged to carefully read this Notice before installing the APP and/or registering on the APP.

1. DATA CONTROLLER

Please be informed that the data controller is the company ELETTRONICA S.p.A. (VAT Number 00886951003 with registered office at via Tiburtina, Valeria km 13,700, Rome, (hereinafter referred to as "Elt" or the "Data Controller") email: privacy@e4.life. The complete list of data processing managers is available upon written request sent to the email address above.

2. COLLECTED PERSONAL DATA

Elt processes data provided by Users, in accordance with this Notice.

Specifically, for the purposes indicated in Article 3, the following data will be processed: (i) user's name and surname, (ii) email, (iii) e4life device identifier.

The mentioned data is processed only to the extent necessary to achieve the purposes described in paragraph 3 of this Notice.

Personal data is provided by the User during registration. Failure to provide them prevents User registration.

3. PURPOSES OF PROCESSING

The purposes for which Users are asked to provide their personal data to Elt are as follows:

- a. Allow the User to register on the APP;
- b. Update the firmware of the device;
- c. Send communications related to the operation and update of the device, as well as new features and/or services associated with it (via email or push notifications, if allowed by the User);
- d. Monitor and analyze data on the use of the device/APP, in order to resolve errors and/or improve and evolve the service in favor of the User's experience

4. LEGAL BASIS OF PROCESSING

The Data Controller processes the personal data of the User under the following conditions:

For the purposes indicated in Article 3 preceding, letters a) to d), as necessary for access to the APP and for the use of the firmware update service through the APP (Art. 6, paragraph 2, PDPL).

5. PROCESSING METHODS

User personal data is processed with the support of computerized means and is protected through adequate security measures suitable for ensuring confidentiality and security.

In particular, Elt adopts appropriate organizational and technical measures to protect the personal data in its possession, aimed at preventing unauthorized access, disclosure, alteration, loss, and destruction of such data.

6. SCOPE OF DATA COMMUNICATION AND DISCLOSURE

For the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the “Elettronica Group” in Saudi Arabia, Italy and abroad, both nationally and internationally, as detailed in Section 7 below.

User personal data will not be disclosed to undetermined parties other than those mentioned above.

7. PROCESSING OF PERSONAL DATA OUTSIDE THE KINGDOM OF SAUDI ARABIA

To achieve the purposes outlined in this Notice, personal data may be transferred outside the national territory to countries or to entities located outside the Kingdom of Saudi Arabia.

The potential transfer of User personal data to countries outside the Kingdom of Saudi Arabia will, in any case, occur in compliance with applicable laws, without prejudice to the rights of the User as provided by law.

Where applicable, Elt will use data protection safeguards provided by Articles 5 and subsequent of the the Data Transfer Regulations, such as, for example, standard contractual clauses. In other cases, the transfer of personal data may be based on an adequacy decision under Article 3 of the Data Transfer Regulations. The User can obtain a copy of the safeguards implemented by Elt, approved by competent authorities, by sending a specific request to the address privacy@e4.life.

8. DATA RETENTION PERIOD

Elt will retain personal data for the period necessary to fulfill the purposes for which they were collected, as outlined in this Notice.

To determine the most appropriate retention periods for User personal data, Elt has taken into consideration, among other factors, the quantity, nature, and sensitivity of the personal data and the reasons for which they were collected. For example:

- Data collected for purposes a), b), c) in Article 3 above will be retained until the deletion of the profile, which can be done by uninstalling the App or by sending a written request to the email address privacy@e4.life, unless legitimate reasons require further retention.
- Data collected for purpose d) in Article 3 above is associated with the device ID and, once the profile data is deleted (disconnecting the link to the user-device), is retained permanently as it is no longer attributable to an user.

9. DATA SUBJECTS RIGHTS

The User may, at any time, exercise the rights provided in Articles 4 and subsequent of the “Personal Data protection Law” (Issued pursuant to Royal Decree No. (M/19) dated 09/02/1443 AH corresponding to 16/09/2021 G Amended pursuant to Royal Decree No. (M/148) dated 05/09/1444 AH corresponding to 27/03/2023 G) and 3 and subsequent of the Implementing Regulation of the Personal Data protection Law, including: access to personal data, request rectification and/or deletion of information we hold/process about you, object to the processing of your data, request a copy of the information we hold/process about you, withdraw consent to the processing of your information (to the extent that such processing is based on consent), obtain restriction of the processing of your data by us, request that the personal data you provided to us be transferred to you or to third parties in machine-readable formats, and request data portability. Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the User to verify his identity and provide information to help Elt better understand the request.

If you wish to exercise the above rights, change contact preferences, notify Elt of any updates to their data, request profile deletion, or obtain further information about Elt's use of your personal data please contact Elt at the email address privacy@e4.life.

Otherwise, to protect your rights, you can contact the “Saudi Data & AI Authority” to the email: dmo@sdaia.gov.sa.

10. CHANGES AND UPDATES

This Notice is effective from the date of its publication on the APP. Elt may make changes and/or additions to it, also as a result of any subsequent legislative changes and/or additions. The latest version of our Notice is always available in the dedicated section on the APP.

ELETTRONICA S.p.A

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Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of Morocco



The following information is provided in accordance with a) the Regulation EU 2016/679 ("GDPR") and the Code on the Protection of Personal Data (Legislative Decree no.196 of 30 June 2003); and b) the Law no. 09-08, dated February 18, 2009 relating to protection of individuals with regard to the processing of personal data and its implementation Decree n° 2-09-165 of May 21, 2009 ("Moroccan Data Protection Law") (§ 10 of this Notice). Moroccan customers should read the sections below which pertain to E4LIFE, as these contain important information related to Morocco, concerning the processing of personal data of data subjects/users (hereinafter referred to as "Users" or singularly the "User") who download, access, and use the mobile app "E4Life" (hereinafter "APP").

Users are urged to carefully read this Notice before installing the APP and/or registering on the APP.

1. DATA CONTROLLER

Please be informed that the data controller is the company ELETTRONICA S.p.A. (VAT Number 00886951003 with registered office at via Tiburtina, Valeria km 13,700, Rome, (hereinafter referred to as "Elt" or the "Data Controller") email: privacy.e4lifecorporate@e4life.it. The complete list of data processing managers is available upon written request sent to the email address above.

2. COLLECTED PERSONAL DATA

Elt processes data provided by Users, in accordance with this Notice.

Specifically, for the purposes indicated in Article 3, the following data will be processed: (i) user's name and surname, (ii) email, (iii) e4life device identifier.

The aforementioned data is processed only to the extent necessary to achieve the purposes described in paragraph 3 of this Notice.

Personal data is provided by the User during registration. Failure to provide them prevents User registration.

3. PURPOSES OF PROCESSING

The purposes for which Users are asked to provide their personal data to Elt are as follows:

- a) Allow the User to register on the APP;
- b) Update the firmware of the device;
- c) Send communications related to the operation and update of the device, as well as new features and/or services associated with it (via email or push notifications, if allowed by the User);
- d) Monitor and analyze data on the use of the device/APP, in order to resolve errors and/or improve and evolve the service in favor of the User's experience

4. LEGAL BASIS OF PROCESSING

The Data Controller processes the personal data of the User under the following conditions:

- a) For the purposes indicated in Article 3 preceding, letters a) to c), as necessary for access to the APP and for the use of the firmware update service through the APP (Art. 6, paragraph 1, letter b), GDPR).
- b) For the purposes indicated in Article 3 preceding, letter d), to pursue the legitimate interest of the Data Controller (Art. 6, letter f), GDPR).

5. PROCESSING METHODS

User personal data is processed with the support of computerized means and is protected through adequate

In particular, Elt adopts appropriate organizational and technical measures to protect the personal data in its possession, aimed at preventing unauthorized access, disclosure, alteration, loss, and destruction of such data.

6. SCOPE OF DATA COMMUNICATION AND DISCLOSURE

For the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the processing purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the “Elettronica Group” in Italy and abroad, both nationally and internationally, as detailed in Section 7 below.

User personal data will not be disclosed to undetermined parties other than those mentioned above.

7. PROCESSING OF PERSONAL DATA OUTSIDE MOROCCO

To achieve the purposes outlined in this Notice, personal data may be transferred outside the national territory (Morocco) to countries located within the European Union or to entities located outside the European Economic Area ("EEA").

The potential transfer of User personal data to countries outside Morocco will, in any case, occur in compliance with applicable laws, without prejudice to the rights of the User as provided by law.

Where applicable, Elt will use data protection safeguards provided by Articles 46 and following of the GDPR, such as, for example, standard contractual clauses. In other cases, the transfer of personal data may be based on an adequacy decision under Article 45 of the GDPR. The User can obtain a copy of the safeguards implemented by Elt, approved by competent authorities, by sending a specific request to the address privacy.e4lifecorporate@e4life.it.

8. DATA RETENTION PERIOD

Elt will retain personal data for the period necessary to fulfill the purposes for which they were collected, as outlined in this Notice.

To determine the most appropriate retention periods for User personal data, Elt has taken into consideration, among other factors, the quantity, nature, and sensitivity of the personal data and the reasons for which they were collected. For example:

- Data collected for purposes a), b), c) in Article 3 above will be retained until the deletion of the profile, which can be done by uninstalling the App or by sending a written request to the email address privacy.e4lifecorporate@e4life.it, unless legitimate reasons require further retention.
- Data collected for purpose d) in Article 3 above is associated with the device ID and, once the profile data is deleted (disconnecting the link to the user-device), is retained permanently as it is no longer attributable to an user.

9. USER RIGHTS

The User may, at any time, exercise the rights provided in Articles 15-22 of the GDPR, including: access to personal data, request rectification and/or deletion of information we hold/process about you, object to the processing of your data, request a copy of the information we hold/process about you, withdraw consent to the processing of your information (to the extent that such processing is based on consent), obtain restriction of the processing of your data by us, request that the personal data you provided to us be transferred to you or to third parties in machine-readable formats, and request data portability.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the User to verify his identity and provide information to help Elt better understand the request.

The User also has the right to lodge a complaint with the Supervisory Authority (in Italy, it is the Italian Data Protection Authority) with registered office at Piazza Venezia 11, Rome (00187) and email protocollo@gpdp.it, or with another data protection supervisory authority in the Country in which you reside.

The User can exercise the above rights, change contact preferences, notify Elt of any updates to their data, request profile deletion, or obtain further information about Elt's use of their personal data by contacting Elt at the email address privacy.e4lifecorporate@e4life.it.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the user to verify his identity and provide information to help Elt better understand the request.

10. PRIVACY POLICY (supplement just for Morocco Residents)

This section supplements the information contained in our Privacy Policy, and applies solely to the processing of Moroccan consumers' personal information (it does not apply to employment-related personal information collected from Morocco-based employees, job applicants, contractors, or similar individuals). This section is intended to address the relevant notice requirements of the Moroccan Data Protection Law, and uses certain terms having the meaning given in the aforementioned Law.

10.1 USER RIGHTS

Subject to exceptions under applicable law, you may have certain choices regarding our use and disclosure of your personal information, as described below:

- According to Article 7 of the Moroccan Data Protection Law, you have the right to request that we disclose to you the personal information that we have collected about and details regarding our collection, use, disclosure of such information.
- Moreover, According to Article 8 of the Moroccan Data Protection Law, you have the right to request the update, correction, or deletion of the personal information we have collected from you subject to certain exceptions.
- You have also the right to manage the activation of the cookies as described in the cookie section (if applicable).

To exercise your rights, described above, you can contact us directly at the address indicated above (privacy.e4lifecorporate@e4life.it). If you exercise your rights, we may require you to provide certain information to verify your identity (such as your name, email address, phone number and/or address).

11. CHANGES AND UPDATES

This Notice is effective from the date of its publication on the APP. Elt may make changes and/or additions to it, also as a result of any subsequent legislative changes and/or additions. The latest version of our Notice is always available in the dedicated section on the APP.

ELETTRONICA S.p.A



The following information is provided in accordance with a) the Regulation EU 2016/679 (hereinafter "GDPR") and the Italian Code on the Protection of Personal Data (Legislative Decree no.196 of 30 June 2003) and b) the Personal Data Protection Act 2012 of Singapore (hereinafter "PDPA"), which regulates the collection, use, and disclosure of personal information in Singapore. Customers should read the sections below which pertain to E4LIFE, as these contain important information concerning the processing of personal data of data subjects/users (hereinafter referred to as "Users" or singularly the "User") who download, access, and use the mobile app "E4Life" (hereinafter "APP").

Users are urged to carefully read this Notice before installing the APP and/or registering on the APP.

1. DATA CONTROLLER

Please be informed that the data controller is the company ELETTRONICA S.p.A. (VAT Number 00886951003 with registered office at via Tiburtina, Valeria km 13,700, Rome, (hereinafter referred to as "Elt" or the "Data Controller") email: privacy.e4lifecorporate@e4life.it. The complete list of data processing managers is available upon written request sent to the email address above.

2. COLLECTED PERSONAL DATA

Elt processes data provided by Users, in accordance with this Notice.

Specifically, for the purposes indicated in Article 3, the following data will be processed: (i) user's name and surname, (ii) email, (iii) e4life device identifier.

The aforementioned data is processed only to the extent necessary to achieve the purposes described in paragraph 3 of this Notice.

Personal data is provided by the User during registration. Failure to provide them prevents User registration.

3. PURPOSES OF PROCESSING

The purposes for which Users are asked to provide their personal data to Elt are as follows:

- a) Allow the User to register on the APP;
- b) Update the firmware of the device;
- c) Send communications related to the operation and update of the device, as well as new features and/or services associated with it (via email or push notifications, if allowed by the User);
- d) Monitor and analyze data on the use of the device/APP, in order to resolve errors and/or improve and evolve the service in favor of the User's experience

4. LEGAL BASIS OF PROCESSING

The Data Controller processes the personal data of the User under the following conditions:

- a) For the purposes indicated in Article 3 preceding, letters a) to c), as necessary for access to the APP and for the use of the firmware update service through the APP (Art. 6, paragraph 1, letter b), GDPR).
- b) For the purposes indicated in Article 3 preceding, letter d), to pursue the legitimate interest of the Data Controller (Art. 6, letter f), GDPR).

5. PROCESSING METHODS

User personal data is processed with the support of computerized means and is protected through

In particular, Elt adopts appropriate organizational and technical measures – also in accordance with the PDPA - to protect the personal data in its possession, aimed at preventing unauthorized access, disclosure, alteration, loss, and destruction of such data.

6. SCOPE OF DATA COMMUNICATION AND DISCLOSURE

For the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the 'Elettronica Group' that process personal data outside of Singapore. Elt will ensure that any third parties involved in processing personal data meet the requirements of the PDPA.

User personal data will not be disclosed to undetermined parties other than those mentioned above.

7. PROCESSING OF PERSONAL DATA OUTSIDE SINGAPORE

To achieve the purposes outlined in this Notice, personal data will be transferred outside the national territory (Singapore) to entities located within the European Union ("EU")/European Economic Area ("EEA") or to entities located outside the EU/EEA.

The potential transfer of User personal data to countries outside the Singapore will, in any case, occur in compliance with applicable laws, without prejudice to the rights of the User as provided by law.

Where applicable, Elt will use data protection safeguards provided by Articles 46 and following of the GDPR, such as, for example, standard contractual clauses. In other cases, the transfer of personal data may be based on an adequacy decision under Article 45 of the GDPR. The User can obtain a copy of the safeguards implemented by Elt, approved by competent authorities, by sending a specific request to the address privacy.e4lifecorporate@e4life.it.

Further, where applicable, Elt will ensure that personal data transferred outside of Singapore is subject to appropriate safeguards, such as contractual agreements, to ensure an equivalent level of protection as required by the PDPA.

8. DATA RETENTION PERIOD

Elt will retain personal data for the period necessary to fulfill the purposes for which they were collected, as outlined in this Notice.

To determine the most appropriate retention periods for User personal data, Elt has taken into consideration, among other factors, the quantity, nature, and sensitivity of the personal data and the reasons for which they were collected. For example:

- Data collected for purposes a), b), c) in Article 3 above will be retained until the deletion of the profile, which can be done by uninstalling the App or by sending a written request to the email address privacy.e4lifecorporate@e4life.it, unless legitimate reasons require further retention.
- Data collected for purpose d) in Article 3 above is associated with the device ID and, once the profile data is deleted (disconnecting the link to the user-device), is retained permanently as it is no longer attributable to an user.

9. USER RIGHTS

The User may, at any time, exercise the rights provided in Articles 15-22 of the GDPR, including: access to personal data, request rectification and/or deletion of information we hold/process about you, object to the processing of your data, request a copy of the information we hold/process about you, withdraw consent to the processing of your information (to the extent that such processing is

based on consent), obtain restriction of the processing of your data by us, request that the personal data you provided to us be transferred to you or to third parties in machine-readable formats, and request data portability.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the User to verify his identity and provide information to help Elt better understand the request.

The User also has the right to lodge a complaint with the Supervisory Authority (in Italy, it is the Italian Data Protection Authority) with registered office at Piazza Venezia 11, Rome (00187) and email protocollo@gpdp.it, or with another data protection supervisory authority in the Country in which you reside.

The User can exercise the above rights, change contact preferences, notify Elt of any updates to their data, request profile deletion, or obtain further information about Elt's use of their personal data by contacting Elt at the email address privacy.e4lifecorporate@e4life.it.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the user to verify his identity and provide information to help Elt better understand the request.

10. PRIVACY POLICY (supplement just for Singapore Residents)

This section supplements the information contained in our Privacy Policy, and applies solely to the processing of Singaporean consumers' personal information (it does not apply to employment-related personal information collected from Singapore-based employees, job applicants, contractors, or similar individuals). This section is intended to address the relevant notice requirements of the PDPA, and uses certain terms having the meaning given in the aforementioned Law.

10.1 SCOPE OF DATA COMMUNICATION AND DISCLOSURE

According to the First Schedule, Part 4 of the PDPA, for the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the 'Elettronica Group' that process personal data outside of Singapore. Elt will ensure that any third parties involved in processing personal data meet the requirements of Part 6, article 26, paragraph (1) of the PDPA.

10.2 USER RIGHTS

Subject to exceptions under applicable law, you may have certain choices regarding our use and disclosure of your personal information, as described below:

- According to Part 5, Article 21 of the PDPA, you have the right to request that we disclose to you the personal information that we have collected about and details regarding our collection, use, disclosure of such information.
- Moreover, According to Part 5, Article 22 of the PDPA, you have the right to request the update, correction, or deletion of the personal information we have collected from you subject to certain exceptions.
- You have the right to manage the activation of the cookies as described in the cookie section (if applicable).
- You have also the right to lodge a complaint with the Personal Data Protection Commission of

Singapore. For more information, please visit [<https://www.pdpc.gov.sg/overview-of-pdpa/the-legislation/personal-data-protection-act>].
v.20251112

To exercise your rights, described above, you can contact us directly at the address indicated above (privacy.e4lifecorporate@e4life.it). If you exercise your rights, we may require you to provide certain information to verify your identity (such as your name, email address, phone number and/or address).

11. CHANGES AND UPDATES

This Notice is effective from the date of its publication on the APP. Elt may make changes and/or additions to it, also as a result of any subsequent legislative changes and/or additions. The latest version of our Notice is always available in the dedicated section on the APP.

ELETTRONICA S.p.A



The following information is provided in accordance with a) the Regulation EU 2016/679 (hereinafter "GDPR") and the Italian Code on the Protection of Personal Data (Legislative Decree no.196 of 30 June 2003) and b) the Federal Privacy Act of Australia (1988), the Privacy and Other Legislation Amendment Act of Australia (2024) and the Australian Privacy Principles (hereinafter jointly "Australian Privacy Regulation"), which regulates the collection, use, and disclosure of personal information in Australia. Customers should read the sections below which pertain to E4LIFE, as these contain important information concerning the processing of personal data of data subjects/users (hereinafter referred to as "Users" or singularly the "User") who download, access, and use the mobile app "E4Life" (hereinafter "APP").

Users are urged to carefully read this Notice before installing the APP and/or registering on the APP.

1. DATA CONTROLLER

Please be informed that the data controller is the company ELETTRONICA S.p.A. (VAT Number 00886951003 with registered office at via Tiburtina, Valeria km 13,700, Rome, (hereinafter referred to as "Elt" or the "Data Controller") email: privacy.e4lifecorporate@e4life.it. The complete list of data processing managers is available upon written request sent to the email address above.

2. COLLECTED PERSONAL DATA

Elt processes data provided by Users, in accordance with this Notice.

Specifically, for the purposes indicated in Article 3, the following data will be processed: (i) user's name and surname, (ii) email, (iii) e4life device identifier.

The aforementioned data is processed only to the extent necessary to achieve the purposes described in paragraph 3 of this Notice.

Personal data is provided by the User during registration. Failure to provide them prevents User registration.

3. PURPOSES OF PROCESSING

The purposes for which Users are asked to provide their personal data to Elt are as follows:

- a) Allow the User to register on the APP;
- b) Update the firmware of the device;
- c) Send communications related to the operation and update of the device, as well as new features and/or services associated with it (via email or push notifications, if allowed by the User);
- d) Monitor and analyze data on the use of the device/APP, in order to resolve errors and/or improve and evolve the service in favor of the User's experience

4. LEGAL BASIS OF PROCESSING

The Data Controller processes the personal data of the User under the following conditions:

- a) For the purposes indicated in Article 3 preceding, letters a) to c), as necessary for access to the APP and for the use of the firmware update service through the APP (Art. 6, paragraph 1, letter b), GDPR).
- b) For the purposes indicated in Article 3 preceding, letter d), to pursue the legitimate interest of the Data Controller (Art. 6, letter f), GDPR).

5. PROCESSING METHODS

User personal data is processed with the support of computerized means and is protected through adequate security measures suitable for ensuring confidentiality and security.

In particular, Elt adopts appropriate organizational and technical measures – also in accordance with the Australian Privacy Regulation - to protect the personal data in its possession, aimed at preventing unauthorized

6. SCOPE OF DATA COMMUNICATION AND DISCLOSURE

For the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the 'Elettronica Group' that process personal data outside of Australia. Elt will ensure that any third parties involved in processing personal data meet the requirements of the Australian Privacy Regulation.

User personal data will not be disclosed to undetermined parties other than those mentioned above.

7. PROCESSING OF PERSONAL DATA OUTSIDE AUSTRALIA

To achieve the purposes outlined in this Notice, personal data will be transferred outside the national territory (Australia) to entities located within the European Union ("EU")/European Economic Area ("EEA") or to entities located outside the EU/EEA.

The potential transfer of User personal data to countries outside the Australia will, in any case, occur in compliance with applicable laws, without prejudice to the rights of the User as provided by law.

Where applicable, Elt will use data protection safeguards provided by Articles 46 and following of the GDPR, such as, for example, standard contractual clauses. In other cases, the transfer of personal data may be based on an adequacy decision under Article 45 of the GDPR. The User can obtain a copy of the safeguards implemented by Elt, approved by competent authorities, by sending a specific request to the address privacy.e4lifecorporate@e4life.it.

Further, where applicable, Elt will ensure that personal data transferred outside of Australia is subject to appropriate safeguards, such as contractual agreements, to ensure an equivalent level of protection as required by the Australian Privacy Regulation.

8. DATA RETENTION PERIOD

Elt will retain personal data for the period necessary to fulfill the purposes for which they were collected, as outlined in this Notice.

To determine the most appropriate retention periods for User personal data, Elt has taken into consideration, among other factors, the quantity, nature, and sensitivity of the personal data and the reasons for which they were collected. For example:

- Data collected for purposes a), b), c) in Article 3 above will be retained until the deletion of the profile, which can be done by uninstalling the App or by sending a written request to the email address privacy.e4lifecorporate@e4life.it, unless legitimate reasons require further retention.
- Data collected for purpose d) in Article 3 above is associated with the device ID and, once the profile data is deleted (disconnecting the link to the user-device), is retained permanently as it is no longer attributable to an user.

9. USER RIGHTS

The User may, at any time, exercise the rights provided in Articles 15-22 of the GDPR, including: access to personal data, request rectification and/or deletion of information we hold/process about you, object to the processing of your data, request a copy of the information we hold/process about you, withdraw consent to the processing of your information (to the extent that such processing is based on consent), obtain restriction of the processing of your data by us, request that the personal data you provided to us be transferred to you or to third parties in machine-readable formats, and request data portability.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the User to verify his identity and provide information to help Elt better understand the request.

The User also has the right to lodge a complaint with the Supervisory Authority (in Italy, it is the Italian Data

Protection Authority) with registered office at Piazza Venezia 11, Rome (00187) and email protocollo@gpdp.it, or with another data protection supervisory authority in the Country in which you reside. v.20251112

The User can exercise the above rights, change contact preferences, notify Elt of any updates to their data, request profile deletion, or obtain further information about Elt's use of their personal data by contacting Elt at the email address privacy.e4lifecorporate@e4life.it.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the user to verify his identity and provide information to help Elt better understand the request.

10. PRIVACY POLICY (supplement just for Australia Residents)

This section supplements the information contained in our Privacy Policy, and applies solely to the processing of Australian consumers' personal information (it does not apply to employment-related personal information collected from Australia-based employees, job applicants, contractors, or similar individuals). This section is intended to address the relevant notice requirements of the Australian Privacy Regulation, and uses certain terms having the meaning given in the aforementioned Law.

10.1 SCOPE OF DATA COMMUNICATION AND DISCLOSURE

According to Part 3, Division 2, Article 16A of the Federal Privacy Act of Australia and Article 3.2 of the Australian Privacy Principles, for the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the 'Elettronica Group' that process personal data outside of Australia. Elt will ensure that any third parties involved in processing personal data meet the requirements of Part 3, Division 2, Article 16A of the Federal Privacy Act of Australia and Article 3.2 of the Australian Privacy Principles.

10.2 TRANSFER OF PERSONAL DATA OUTSIDE AUSTRALIA

In accordance with the Australian Privacy Regulation and the General Data Protection Regulation (GDPR), Elt may transfer Users' personal data outside Australia to entities located in the European Union (EU)/European Economic Area (EEA) or other third countries.

- Elt ensures that such transfers comply with applicable data protection laws by implementing appropriate safeguards. In particular, Elt may rely on: Standard Contractual Clauses (SCCs) approved by the European Commission (Article 46 GDPR);
- Other appropriate safeguards as required under Article 8 of the Australian Privacy Principles, including contractual agreements ensuring an equivalent level of data protection.

10.3 USER RIGHTS

Subject to exceptions under applicable law, you may have certain choices regarding our use and disclosure of your personal information, as described below:

- According to Article 12 of the Australian Privacy Principles, you have the right to request that we disclose to you the personal information that we have collected about and details regarding our collection, use, disclosure of such information.
- Moreover, according Article 13 of the Australian Privacy Principles, you have the right to request the update, correction, or deletion of the personal information we have collected from you subject to certain exceptions.
- You have the right to manage the activation of the cookies as described in the cookie section (if applicable).
- You have also the right to lodge a complaint with the Australian Information Commissioner. For more

information, please visit [<https://www.oaic.gov.au/privacy/privacy-complaints>].

v.20251112

To exercise your rights, described above, you can contact us directly at the address indicated above (privacy.e4lifecorporate@e4life.it). If you exercise your rights, we may require you to provide certain information to verify your identity (such as your name, email address, phone number and/or address).

11. CHANGES AND UPDATES

This Notice is effective from the date of its publication on the APP. Elt may make changes and/or additions to it, also as a result of any subsequent legislative changes and/or additions. The latest version of our Notice is always available in the dedicated section on the APP.

ELETTRONICA S.p.A

Privacy Policy of the mobile app E4Life, concerning the processing of personal data of data subjects who download, access, and use the app within the territory of New Zealand

v.20251112



The following information is provided in accordance with a) the Regulation EU 2016/679 (hereinafter "GDPR") and the Italian Code on the Protection of Personal Data (Legislative Decree no.196 of 30 June 2003) and b) the New Zealand Privacy Act 2020 (hereinafter "PA2020"), which regulates the collection, use, and disclosure of personal information in New Zealand. Customers should read the sections below which pertain to E4LIFE, as these contain important information concerning the processing of personal data of data subjects/users (hereinafter referred to as "Users" or singularly the "User") who download, access, and use the mobile app "E4Life" (hereinafter "APP").

Users are urged to carefully read this Notice before installing the APP and/or registering on the APP.

1. DATA CONTROLLER

Please be informed that the data controller is the company ELETTRONICA S.p.A. (VAT Number 00886951003 with registered office at via Tiburtina, Valeria km 13,700, Rome, (hereinafter referred to as "Elt" or the "Data Controller") email: privacy.e4lifecorporate@e4life.it. The complete list of data processing managers is available upon written request sent to the email address above.

2. COLLECTED PERSONAL DATA

Elt processes data provided by Users, in accordance with this Notice.

Specifically, for the purposes indicated in Article 3, the following data will be processed: (i) user's name and surname, (ii) email, (iii) e4life device identifier.

The aforementioned data is processed only to the extent necessary to achieve the purposes described in paragraph 3 of this Notice.

Personal data is provided by the User during registration. Failure to provide them prevents User registration.

3. PURPOSES OF PROCESSING

The purposes for which Users are asked to provide their personal data to Elt are as follows:

- e) Allow the User to register on the APP;
- f) Update the firmware of the device;
- g) Send communications related to the operation and update of the device, as well as new features and/or services associated with it (via email or push notifications, if allowed by the User);
- h) Monitor and analyze data on the use of the device/APP, in order to resolve errors and/or improve and evolve the service in favor of the User's experience

4. LEGAL BASIS OF PROCESSING

The Data Controller processes the personal data of the User under the following conditions:

- c) For the purposes indicated in Article 3 preceding, letters a) to c), as necessary for access to the APP and for the use of the firmware update service through the APP (Art. 6, paragraph 1, letter b), GDPR).
- d) For the purposes indicated in Article 3 preceding, letter d), to pursue the legitimate interest of the Data Controller (Art. 6, letter f), GDPR).

5. PROCESSING METHODS

User personal data is processed with the support of computerized means and is protected through adequate security measures suitable for ensuring confidentiality and security.

In particular, Elt adopts appropriate organizational and technical measures – also in accordance with the PA2020 – to protect the personal data in its possession, aimed at preventing unauthorized access, disclosure, alteration, loss, and destruction of such data.

6. SCOPE OF DATA COMMUNICATION AND DISCLOSURE

For the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities: v.20251112

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the 'Elettronica Group' that process personal data outside of New Zealand. Elt will ensure that any third parties involved in processing personal data meet the requirements of the PA2020.

User personal data will not be disclosed to undetermined parties other than those mentioned above.

7. PROCESSING OF PERSONAL DATA OUTSIDE NEW ZEALAND

To achieve the purposes outlined in this Notice, personal data will be transferred outside the national territory (New Zealand) to entities located within the European Union ("EU")/European Economic Area ("EEA") or to entities located outside the EU/EEA.

The potential transfer of User personal data to countries outside the New Zealand will, in any case, occur in compliance with applicable laws, without prejudice to the rights of the User as provided by law.

Where applicable, Elt will use data protection safeguards provided by Articles 46 and following of the GDPR, such as, for example, standard contractual clauses. In other cases, the transfer of personal data may be based on an adequacy decision under Article 45 of the GDPR. The User can obtain a copy of the safeguards implemented by Elt, approved by competent authorities, by sending a specific request to the address privacy.e4lifecorporate@e4life.it.

Further, where applicable, Elt will ensure that personal data transferred outside of New Zealand is subject to appropriate safeguards, such as contractual agreements, to ensure an equivalent level of protection.

8. DATA RETENTION PERIOD

Elt will retain personal data for the period necessary to fulfill the purposes for which they were collected, as outlined in this Notice.

To determine the most appropriate retention periods for User personal data, Elt has taken into consideration, among other factors, the quantity, nature, and sensitivity of the personal data and the reasons for which they were collected. For example:

- Data collected for purposes a), b), c) in Article 3 above will be retained until the deletion of the profile, which can be done by uninstalling the App or by sending a written request to the email address privacy.e4lifecorporate@e4life.it, unless legitimate reasons require further retention.
- Data collected for purpose d) in Article 3 above is associated with the device ID and, once the profile data is deleted (disconnecting the link to the user-device), is retained permanently as it is no longer attributable to an user.

9. USER RIGHTS

The User may, at any time, exercise the rights provided in Articles 15-22 of the GDPR, including: access to personal data, request rectification and/or deletion of information we hold/process about you, object to the processing of your data, request a copy of the information we hold/process about you, withdraw consent to the processing of your information (to the extent that such processing is based on consent), obtain restriction of the processing of your data by us, request that the personal data you provided to us be transferred to you or to third parties in machine-readable formats, and request data portability.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the User to verify his identity and provide information to help Elt better understand the request.

The User also has the right to lodge a complaint with the Supervisory Authority (in Italy, it is the Italian Data Protection Authority) with registered office at Piazza Venezia 11, Rome (00187) and email protocollo@gpdp.it, or with another data protection supervisory authority in the Country in which you reside.

The User can exercise the above rights, change contact preferences, notify Elt of any updates to their data,

request profile deletion, or obtain further information about Elt's use of their personal data by contacting Elt at the email address privacy.e4lifecorporate@e4life.it. v.20251112

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the user to verify his identity and provide information to help Elt better understand the request.

10. PRIVACY POLICY (supplement just for New Zealand Residents)

This section supplements the information contained in our Privacy Policy, and applies solely to the processing of New Zealand consumers' personal information. This section is intended to address the relevant notice requirements of the PA2020, and uses certain terms having the meaning given in the aforementioned Law.

10.1 SCOPE OF DATA COMMUNICATION AND DISCLOSURE

The Data Controller ensures that all the following third parties receiving such data comply with the applicable data protection laws, including the Privacy Act 2020 of New Zealand:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the 'Elettronica Group' that process personal data outside of New Zealand. Elt will ensure that any third parties involved in processing personal data meet the requirements of the PA2020.

10.2 TRANSFER OF PERSONAL DATA OUTSIDE NEW ZEALAND

In accordance with the Privacy Act 2020 and the General Data Protection Regulation (GDPR), Elt may transfer Users' personal data outside New Zealand to entities located in the European Union (EU)/European Economic Area (EEA) or other third countries.

Elt ensures that such transfers comply with applicable data protection laws by implementing appropriate safeguards. In particular, Elt may rely on:

- Adequacy decisions issued by the New Zealand Privacy Commissioner or the European Commission;
- Standard Contractual Clauses (SCCs) approved by the European Commission to ensure equivalent data protection standards;

Other appropriate safeguards as required under PA2020. The Data Controller commits to implementing all necessary safeguards to ensure that personal data remains protected, in accordance with the Privacy Act 2020.

When transferring personal data outside New Zealand, we adhere to Principle 12 of the Privacy Act 2020.

Users may request further details regarding data transfers by contacting privacy@e4life.it

10.3 USER RIGHTS

Under the PA2020, Principle 6 states that people have a right to ask for access to their own personal information.

Users can only ask for information about themselves. The Privacy Act does not allow you to request information about another person, unless you are acting on that person's behalf and have written permission.

To exercise their rights, users can contact the Data Controller at privacy@e4life.it.

If users believe their data protection rights have been violated, they may file a complaint with the Office of the Privacy Commissioner of New Zealand (<https://www.privacy.org.nz/>).

11. CHANGES AND UPDATES

v.20251112

This Notice is effective from the date of its publication on the APP. Elt may make changes and/or additions to it, also as a result of any subsequent legislative changes and/or additions. The latest version of our Notice is always available in the dedicated section on the APP.

ELETTRONICA S.p.A

Privacy Policy of the E4Life APP (Japan)



The following information is provided in accordance with a) the Regulation EU 2016/679 (hereinafter "GDPR") and the Italian Code on the Protection of Personal Data (Legislative Decree no.196 of 30 June 2003) and b) the Act on the Protection of Personal Information (Act No. 57 of 2003) of Japan (hereinafter "APPI"), which regulates the collection, use, and disclosure of personal information in Japan. Customers should read the sections below which pertain to E4LIFE, as these contain important information concerning the processing of personal data of data subjects/users (hereinafter referred to as "Users" or singularly the "User") who download, access, and use the mobile app "E4Life" (hereinafter "APP").

Users are urged to carefully read this Notice before installing the APP and/or registering on the APP.

1. DATA CONTROLLER

Please be informed that the data controller is the company ELETTRONICA S.p.A. (VAT Number 00886951003 with registered office at via Tiburtina, Valeria km 13,700, Rome, (hereinafter referred to as "Elt" or the "Data Controller") email: privacy.e4lifecorporate@e4life.it. The complete list of data processing managers is available upon written request sent to the email address above.

2. COLLECTED PERSONAL DATA

Elt processes data provided by Users, in accordance with this Notice.

Specifically, for the purposes indicated in Article 3, the following data will be processed: (i) user's name and surname, (ii) email, (iii) e4life device identifier.

The aforementioned data is processed only to the extent necessary to achieve the purposes described in paragraph 3 of this Notice.

Personal data is provided by the User during registration. Failure to provide them prevents User registration.

3. PURPOSES OF PROCESSING

The purposes for which Users are asked to provide their personal data to Elt are as follows:

- a) Allow the User to register on the APP;
- b) Update the firmware of the device;
- c) Send communications related to the operation and update of the device, as well as new features and/or services associated with it (via email or push notifications, if allowed by the User);
- d) Monitor and analyze data on the use of the device/APP, in order to resolve errors and/or improve and evolve the service in favor of the User's experience

4. LEGAL BASIS OF PROCESSING

The Data Controller processes the personal data of the User under the following conditions:

- a) For the purposes indicated in Article 3 preceding, letters a) to c), as necessary for access to the APP and for the use of the firmware update service through the APP (Art. 6, paragraph 1, letter b), GDPR).
- b) For the purposes indicated in Article 3 preceding, letter d), to pursue the legitimate interest of the Data Controller (Art. 6, letter f), GDPR).

5. PROCESSING METHODS

User personal data is processed with the support of computerized means and is protected through adequate

security measures suitable for ensuring confidentiality and security.

In particular, Elt adopts appropriate organizational and technical measures – also in accordance with the APPI - to protect the personal data in its possession, aimed at preventing unauthorized access, disclosure, alteration, loss, and destruction of such data.

6. SCOPE OF DATA COMMUNICATION AND DISCLOSURE

For the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the 'Elettronica Group' that process personal data outside of Japan. Elt will ensure that any third parties involved in processing personal data meet the requirements of the APPI.

User personal data will not be disclosed to undetermined parties other than those mentioned above.

7. PROCESSING OF PERSONAL DATA OUTSIDE JAPAN

To achieve the purposes outlined in this Notice, personal data will be transferred outside the national territory (Japan) to entities located within the European Union ("EU")/European Economic Area ("EEA") or to entities located outside the EU/EEA.

The potential transfer of User personal data to countries outside the Japan will, in any case, occur in compliance with applicable laws, without prejudice to the rights of the User as provided by law.

Where applicable, Elt will use data protection safeguards provided by Articles 46 and following of the GDPR, such as, for example, standard contractual clauses. In other cases, the transfer of personal data may be based on an adequacy decision under Article 45 of the GDPR. The User can obtain a copy of the safeguards implemented by Elt, approved by competent authorities, by sending a specific request to the address privacy.e4lifecorporate@e4life.it.

Further, where applicable, Elt will ensure that personal data transferred outside of Japan is subject to appropriate safeguards, such as contractual agreements, to ensure an equivalent level of protection as required by the APPI.

8. DATA RETENTION PERIOD

Elt will retain personal data for the period necessary to fulfill the purposes for which they were collected, as outlined in this Notice.

To determine the most appropriate retention periods for User personal data, Elt has taken into consideration, among other factors, the quantity, nature, and sensitivity of the personal data and the reasons for which they were collected. For example:

- Data collected for purposes a), b), c) in Article 3 above will be retained until the deletion of the profile, which can be done by uninstalling the App or by sending a written request to the email address privacy.e4lifecorporate@e4life.it, unless legitimate reasons require further retention.
- Data collected for purpose d) in Article 3 above is associated with the device ID and, once the profile data is deleted (disconnecting the link to the user-device), is retained permanently as it is no longer attributable to an user.

9. USER RIGHTS

The User may, at any time, exercise the rights provided in Articles 15-22 of the GDPR, including: access to personal data, request rectification and/or deletion of information we hold/process about you, object to the processing of your data, request a copy of the information we hold/process about you, withdraw consent to the processing of your information (to the extent that such processing is based on consent), obtain restriction of the processing of your data by us, request that the personal data you provided to us be transferred to you or to third parties in machine-readable formats, and request data portability.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the User to verify his identity and provide information to help Elt better understand the request.

The User also has the right to lodge a complaint with the Supervisory Authority (in Italy, it is the Italian Data Protection Authority) with registered office at Piazza Venezia 11, Rome (00187) and email protocollo@gpdp.it, or with another data protection supervisory authority in the Country in which you reside.

The User can exercise the above rights, change contact preferences, notify Elt of any updates to their data, request profile deletion, or obtain further information about Elt's use of their personal data by contacting Elt at the email address privacy.e4lifecorporate@e4life.it.

Some of these rights are not absolute, may not always apply, and exceptions may be allowed. In response to a request, Elt may ask the user to verify his identity and provide information to help Elt better understand the request.

10. PRIVACY POLICY (supplement just for Japan Residents)

This section supplements the information contained in our Privacy Policy, and applies solely to the processing of Japanese consumers' personal information (it does not apply to employment-related personal information collected from Japan-based employees, job applicants, contractors, or similar individuals). This section is intended to address the relevant notice requirements of the APPI, and uses certain terms having the meaning given in the aforementioned Law.

10.1 SCOPE OF DATA COMMUNICATION AND DISCLOSURE

According to Articles 15 and 16 of the APPI, for the purposes outlined in Article 3, Elt may disclose User data in strict correlation with the treatment purposes to the following categories of entities:

- Collaborators, employees, and suppliers of Elt within the scope of their respective duties and/or any contractual obligations related to commercial relationships with Users.
- Suppliers and/or subcontractors/subsidiaries engaged in activities related to the execution of services and products offered by Elt.
- Other companies within the 'Elettronica Group' that process personal data outside of Japan. Elt will ensure that any third parties involved in processing personal data meet the requirements of Article 16 of the APPI.

10.2 TRANSFER OF PERSONAL DATA OUTSIDE JAPAN

In accordance with the Act on the Protection of Personal Information (APPI) and the General Data Protection Regulation (GDPR), Elt may transfer Users' personal data outside Japan to entities located in the European Union (EU)/European Economic Area (EEA) or other third countries.

Elt ensures that such transfers comply with applicable data protection laws by implementing appropriate safeguards. In particular, Elt may rely on:

- An adequacy decision issued by the Japanese Personal Information Protection Commission (PPC) or the European Commission (Article 45 GDPR);
- Standard Contractual Clauses (SCCs) approved by the European Commission (Article 46 GDPR);
- Other appropriate safeguards as required under Article 24 of the APPI, including contractual agreements ensuring an equivalent level of data protection.

10.3 USER RIGHTS

Subject to exceptions under applicable law, you may have certain choices regarding our use and disclosure of your personal information, as described below:

- According to Article 25 of the APPI, you have the right to request that we disclose to you the personal information that we have collected about and details regarding our collection, use, disclosure of such information.
- Moreover, according to Article 26 of the APPI, you have the right to request the update, correction, or deletion of the personal information we have collected from you subject to certain exceptions.
- You have the right to manage the activation of the cookies as described in the cookie section (if applicable).
- You have also the right to lodge a complaint with the Personal Information Protection Commission of Japan. For more information, please visit [<https://www.ppc.go.jp/en/contactus/>].

To exercise your rights, described above, you can contact us directly at the address indicated above (privacy.e4lifecorporate@e4life.it). If you exercise your rights, we may require you to provide certain information to verify your identity (such as your name, email address, phone number and/or address).

11. CHANGES AND UPDATES

This Notice is effective from the date of its publication on the APP. It may make changes and/or additions to it, also as a result of any subsequent legislative changes and/or additions. The latest version of our Notice is always available in the dedicated section on the APP.

ELETTRONICA S.p.A

Informativa dell'applicazione e4life con riferimento al trattamento dei dati personali degli utenti che effettuano il download, accedono e utilizzano l'applicazione nel territorio italiano



Le seguenti informazioni vengono rese ai sensi degli articoli 13 e 14 del Regolamento UE 2016/679 ("GDPR"), con riferimento al trattamento dei dati personali degli interessati al trattamento/utenti (di seguito gli "Utenti" o singolarmente l'"Utente") che effettuano il download, accedono e utilizzano l'APP mobile "E4Life" (di seguito "APP").

Si invitano gli Utenti a leggere attentamente la presente Informativa prima di installare l'APP e/o registrarsi sull'APP.

1. IL TITOLARE DEL TRATTAMENTO DEI DATI PERSONALI

Si informa che il titolare del trattamento è la società ELETTRONICA S.p.A. (P. Iva 00886951003), con sede legale in Roma, via Tiburtina, Valeria km 13,700, e-mail: privacy@e4.life (di seguito, "Elt" o il "Titolare del trattamento"). L'elenco completo dei responsabili del trattamento è disponibile previa richiesta scritta inviata all'indirizzo e-mail sopra indicato.

2. DATI PERSONALI RACCOLTI

Elt tratta i dati forniti dagli Utenti, in conformità con la presente Informativa.

In particolare, per le finalità indicate nell'articolo 3, saranno trattati i seguenti dati: (i) nome e cognome dell'utente, (ii) e-mail, (iii) identificativo del *device* e4life.

I dati sopra indicati vengono trattati solo nella misura in cui risultino necessari per conseguire le finalità descritte al paragrafo 3 della presente Informativa.

I dati personali sono forniti dall'Utente in fase di registrazione. Il loro mancato conferimento impedisce la registrazione dell'Utente.

3. FINALITA' DEL TRATTAMENTO

Le finalità per le quali viene richiesto all'Utente di fornire a Elt i propri dati personali sono le seguenti:

- a) consentire all'Utente di registrarsi sull'APP;
- b) aggiornare il *firmware* del *device*;
- c) inviare comunicazioni relative al funzionamento e all'aggiornamento del *device* nonché a nuove funzionalità e/o servizi ad esso collegati (tramite e-mail o notifiche push, se consentite dall'Utente);
- d) monitorare e analizzare i dati sull'uso dell'APP.

4. BASE GIURIDICA DEL TRATTAMENTO

Il Titolare del trattamento tratta i dati personali dell'Utente alle seguenti condizioni:

- a) per le finalità indicate nell'articolo 3 che precede, lettere da a) a c), in quanto necessario ai fini dell'accesso all'APP e per la fruizione del servizio di aggiornamento del *firmware* tramite l'APP (art. 6, comma 1, lett. b), del GDPR).

- b) per le finalità indicate nell'articolo 3 che precede, lettera d), per il perseguimento del legittimo interesse del Titolare del trattamento (art. 6, lettera f), del GDPR).

5. MODALITA' DI TRATTAMENTO

I dati personali dell'Utente vengono trattati con il supporto di mezzi informatici e sono protetti attraverso adeguate misure di sicurezza idonee a garantirne la riservatezza e la sicurezza.

In particolare, Elt adotta misure organizzative e tecniche appropriate per proteggere i dati personali in suo possesso, volte ad impedire la perdita e distruzione dei dati personali nonché l'accesso, la divulgazione, la modifica non autorizzati degli stessi.

6. AMBITO DI COMUNICAZIONE E DIFFUSIONE DEI DATI

Elt, per le finalità di cui all'articolo 3 potrà comunicare i dati degli Utenti, in stretta correlazione con le finalità del trattamento illustrate, alle seguenti categorie di soggetti:

- ai collaboratori, dipendenti e fornitori di Elt, nell'ambito delle relative mansioni e/o di eventuali obblighi contrattuali con loro, inerenti i rapporti commerciali con gli Utenti;
- ai fornitori e/o subfornitori/subappaltatori impegnati in attività connesse all'esecuzione dei servizi e prodotti offerti da Elt;
- alle altre società del gruppo "Elettronica Group" in Italia e all'estero, nazionali ed internazionali, secondo le modalità di cui al paragrafo 7 che segue.

I dati personali dell'Utente non sono diffusi a soggetti indeterminati, diversi da quelli di cui sopra.

7. TRATTAMENTO EXTRA UE

Per raggiungere le finalità di cui alla presente Informativa, i dati personali potranno essere trasferiti fuori dal territorio nazionale a Paesi situati nell'Unione europea ovvero a soggetti collocati al di fuori dello Spazio Economico Europeo ("SEE").

L'eventuale trasferimento dei dati personali dell'Utente in Paesi situati al di fuori dello SEE avverrà, in ogni caso, in conformità alle leggi vigenti, senza pregiudicare i diritti dell'Utente previsti dalla legge.

Ove applicabili, Elt utilizzerà le garanzie di protezione dei dati personali previste dagli articoli 46 e ss. del GDPR, quali, a titolo meramente esemplificativo, le clausole contrattuali standard. In altri casi, il trasferimento dei dati personali potrà essere basato su una decisione di adeguatezza ai sensi dell'art. 45 del GDPR. L'Utente può ottenere copia delle garanzie implementate da Elt, approvate dalle autorità competenti, tramite l'invio di apposita richiesta all'indirizzo privacy@e4.life.

8. TEMPI DI CONSERVAZIONE DEL DATO

Elt tratterrà i dati personali per il periodo necessario a soddisfare le finalità per le quali gli stessi sono stati raccolti ai sensi della presente Informativa.

Al fine di determinare i periodi di conservazione più appropriati per i dati personali degli Utenti, Elt ha preso in particolare considerazione, tra l'altro, la quantità, la natura e la sensibilità dei dati personali ed i motivi per cui sono stati raccolti.

Per esempio:

- i dati raccolti per le finalità a), b), c), di cui all'articolo 3 che precede, vengono conservati fino alla cancellazione del profilo, che può essere fatta disinstallando l'App, oppure tramite richiesta scritta all'indirizzo e-mail privacy@e4.life, salvo che ragioni legittime non richiedano una conservazione ulteriore;
- i dati raccolti per la finalità d), di cui all'articolo 3 che precede, sono connessi con l'ID del device e, una volta cancellati i dati del profilo (venendo a mancare la connessione utente-device) vengono conservati a titolo permanente in quanto non più riconducibili all'utente.

9. DIRITTI DEGLI UTENTI

L'Utente potrà, in ogni momento, esercitare i diritti di cui agli artt. 15-22 del GDPR e, in particolare: accedere ai tuoi dati personali, chiedere la rettifica e/o la cancellazione delle informazioni che conserviamo/elaboriamo su di te, opporsi al trattamento dei propri dati, richiedere una copia delle informazioni che conserviamo/elaboriamo su di te, revocare il consenso al trattamento delle tue informazioni (nella misura in cui tale trattamento sia basato sul consenso), ottenere la limitazione del trattamento dei tuoi dati da parte nostra, chiedere che i dati personali forniti vengano trasferiti a sé stesso o a terzi, in formati leggibili da una macchina, e chiedere la portabilità dei dati.

Alcuni di questi diritti non sono assoluti: non sempre si applicano e possono essere previste eccezioni. Elt potrebbe, in risposta a una richiesta, chiedere all'utente di verificare la propria identità e di fornire informazioni che aiutino Elt a comprendere meglio la sua richiesta.

L'Utente ha inoltre il diritto di proporre reclamo all'Autorità di Controllo (in Italia è il Garante italiano per la protezione dei dati personali) con sede legale in Piazza Venezia 11, Roma (00187) e email protocollo@gpdp.it.

L'Utente può esercitare i diritti di cui sopra, modificare le modalità di contatto, notificare a Elt eventuali aggiornamenti dei propri dati, richiedere la cancellazione del profilo od ottenere ulteriori informazioni circa l'uso da parte di Elt dei propri dati personali, contattando Elt all'indirizzo e-mail privacy@e4.life.

10. MODIFICHE E AGGIORNAMENTI

La presente Informativa è valida dalla data di sua pubblicazione sulla APP. Elt potrebbe apportare modifiche e/o integrazioni alla stessa, anche quale conseguenza di eventuali successive modifiche e/o integrazioni normative. L'ultima versione della nostra Informativa è sempre disponibile sull'apposita sezione presente sull'APP.

ELETTRONICA S.p.A.

Informativa dell'Applicazione E4Life con riferimento al trattamento dei dati personali degli utenti che effettuano il download, accedono e utilizzano l'Applicazione nel territorio degli Emirati Arabi Uniti



Le seguenti informazioni vengono rese ai sensi del Decreto Federale N. (45) del 2021 relativo alla protezione dei dati personali ("il Decreto"), con riferimento al trattamento dei dati personali degli interessati al trattamento/utenti (di seguito gli "Utenti" o singolarmente l'"Utente") che effettuano il download, accedono e utilizzano l'APP mobile "E4Life" (di seguito "APP").

Si invitano gli Utenti a leggere attentamente la presente Informativa prima di installare l'APP e/o registrarsi sull'APP.

1. IL TITOLARE DEL TRATTAMENTO DEI DATI PERSONALI

Si informa che il titolare del trattamento è la società ELETTRONICA S.p.A. (P. Iva 00886951003), con sede legale in Roma, via Tiburtina, Valeria km 13,700, e-mail: privacy@e4.life (di seguito, "Elt" o il "Titolare del trattamento"). L'elenco completo dei responsabili del trattamento è disponibile previa richiesta scritta inviata all'indirizzo e-mail sopra indicato.

2. DATI PERSONALI RACCOLTI

Elt tratta i dati forniti dagli Utenti, in conformità con la presente Informativa.

In particolare, per le finalità indicate nell'articolo 3, saranno trattati i seguenti dati: (i) nome e cognome dell'utente, (ii) e-mail, (iii) identificativo del *device* e4life.

I dati sopra indicati vengono trattati solo nella misura in cui risultino necessari per conseguire le finalità descritte al paragrafo 3 della presente Informativa.

I dati personali sono forniti dall'Utente in fase di registrazione. Il loro mancato conferimento impedisce la registrazione dell'Utente.

3. FINALITA' DEL TRATTAMENTO

Le finalità per le quali viene richiesto all'Utente di fornire a Elt i propri dati personali sono le seguenti:

- a. consentire all'Utente di registrarsi sull'APP;
- b. aggiornare il *firmware* del *device*;
- c. inviare comunicazioni relative al funzionamento e all'aggiornamento del *device* nonché a nuove funzionalità e/o servizi ad esso collegati (tramite e-mail o notifiche push, se consentite dall'Utente);
- d. monitorare e analizzare i dati sull'uso del device/APP, al fine di risolvere errori e/o migliorare ed evolvere il servizio a favore dell'esperienza dell'Utente.

4. BASE GIURIDICA DEL TRATTAMENTO

Il Titolare del trattamento tratta i dati personali dell'Utente alle seguenti condizioni:

per le finalità indicate nell'articolo 3 che precede, lettere da a) a d), in quanto necessario ai fini dell'accesso all'APP e per la fruizione del servizio di aggiornamento del firmware tramite l'APP (art. 4, comma 9 del Decreto).

5. MODALITA' DI TRATTAMENTO

I dati personali dell'Utente vengono trattati con il supporto di mezzi informatici e sono protetti attraverso adeguate misure di sicurezza idonee a garantirne la riservatezza e la sicurezza.

In particolare, Elt adotta misure organizzative e tecniche appropriate per proteggere i dati personali in suo possesso, volte ad impedire la perdita e distruzione dei dati personali nonché l'accesso, la divulgazione, la modifica non autorizzati degli stessi.

6. AMBITO DI COMUNICAZIONE E DIFFUSIONE DEI DATI

Elt, per le finalità di cui all'articolo 3 potrà comunicare i dati degli Utenti, in stretta correlazione con le finalità del trattamento illustrate, alle seguenti categorie di soggetti:

- ai collaboratori, dipendenti e fornitori di Elt, nell'ambito delle relative mansioni e/o di eventuali obblighi contrattuali con loro, inerenti i rapporti commerciali con gli Utenti;
- ai fornitori e/o subfornitori/subappaltatori impegnati in attività connesse all'esecuzione dei servizi e prodotti offerti da Elt;
- alle altre società del gruppo "Elettronica Group" in UAE, Italia e all'estero, nazionali ed internazionali, secondo le modalità di cui al paragrafo 7 che segue.

I dati personali dell'Utente non sono diffusi a soggetti indeterminati, diversi da quelli di cui sopra.

7. TRATTAMENTO DI DATI PERSONALI AL DI FUORI DELL'UAE

Per raggiungere le finalità di cui alla presente Informativa, i dati personali potranno essere trasferiti fuori dal territorio nazionale a Paesi situati nell'Unione europea ovvero a soggetti collocati al di fuori dell'UAE.

L'eventuale trasferimento dei dati personali dell'Utente in Paesi situati al di fuori dell'UAE avverrà, in ogni caso, in conformità alle leggi vigenti, senza pregiudicare i diritti dell'Utente previsti dalla legge.

Ove applicabili, Elt utilizzerà le garanzie di protezione dei dati personali previste dall'articolo 23 del Decreto. In altri casi, il trasferimento dei dati personali potrà essere basato su una decisione di adeguatezza ai sensi dell'art. 22 del Decreto. L'Utente può ottenere copia delle garanzie implementate da Elt, approvate dalle autorità competenti, tramite l'invio di apposita richiesta all'indirizzo privacy@e4.life.

8. TEMPI DI CONSERVAZIONE DEL DATO

Elt tratterrà i dati personali per il periodo necessario a soddisfare le finalità per le quali gli stessi sono stati raccolti ai sensi della presente Informativa.

Al fine di determinare i periodi di conservazione più appropriati per i dati personali degli Utenti, Elt ha preso in particolare considerazione, tra l'altro, la quantità, la natura e la sensibilità dei dati personali ed i motivi per cui sono stati raccolti.

Per esempio:

- i dati raccolti per le finalità a), b), c), di cui all'articolo 3 che precede, vengono conservati fino alla cancellazione del profilo, che può essere fatta disinstallando l'App, oppure tramite richiesta scritta all'indirizzo e-mail privacy@e4.life salvo che ragioni legittime non richiedano una conservazione ulteriore;
- i dati raccolti per la finalità d), di cui all'articolo 3 che precede, sono connessi con l'ID del device e, una volta cancellati i dati del profilo (venendo a mancare la connessione utente-device) vengono conservati a titolo permanente in quanto non più riconducibili all'utente.

9. DIRITTI DEGLI UTENTI

L'Utente potrà, in ogni momento, esercitare i diritti di cui al Decreto e, in particolare: accedere ai tuoi dati personali, chiedere la rettifica e/o la cancellazione delle informazioni che conserviamo/elaboriamo su di te, opporsi al trattamento dei propri dati, richiedere una copia delle informazioni che conserviamo/elaboriamo su di te, revocare il consenso al trattamento delle tue informazioni (nella misura in cui tale trattamento sia basato sul consenso), ottenere la limitazione del trattamento dei tuoi dati da parte nostra, chiedere che i dati personali forniti vengano trasferiti a sé stesso o a terzi, in formati leggibili da una macchina, e chiedere la portabilità dei dati.

Alcuni di questi diritti non sono assoluti: non sempre si applicano e possono essere previste eccezioni. Elt potrebbe, in risposta a una richiesta, chiedere all'utente di verificare la propria identità e di fornire informazioni che aiutino Elt a comprendere meglio la sua richiesta.

L'Utente può esercitare i diritti di cui sopra, modificare le modalità di contatto, notificare a Elt eventuali aggiornamenti dei propri dati, richiedere la cancellazione del profilo od ottenere ulteriori informazioni circa l'uso da parte di Elt dei propri dati personali, contattando Elt all'indirizzo e-mail privacy@e4.life.

Altrimenti, per tutelare i propri diritti, può contattare, ad Abu Dhabi, "il Commissario per la protezione dei dati del mercato globale di Abu Dhabi" all'indirizzo email dpo@adgm.com o, a Dubai, "il Commissario per la protezione dei dati" all'e-mail commissioner@dp.difc.ae.

10. MODIFICHE E AGGIORNAMENTI

La presente Informativa è valida dalla data di sua pubblicazione sulla APP. Elt potrebbe apportare modifiche e/o integrazioni alla stessa, anche quale conseguenza di eventuali successive modifiche e/o integrazioni normative. L'ultima versione della nostra Informativa è sempre disponibile sull'apposita sezione presente sull'APP.

ELETTRONICA S.p.A.

Informativa dell'Applicazione E4Life con riferimento al trattamento dei dati personali degli utenti che effettuano il download, accedono e utilizzano l'Applicazione nel territorio dell'Arabia Saudita



Le seguenti informazioni vengono rese ai sensi dell' articolo 4, comma 1 del "*Personal Data Protection Law*" emanato con Decreto Reale N. (M/19) del 16/9/2021 e successive modifiche ("PDPL"), nonché dell'articolo 4 del Regolamento Esecutivo entrato in vigore il 6/9/2023 ("*Implementing Regulations*") e del "*Personal Data Transfer Regulations*" entrato in vigore il 6/9/2023 ("*Data Transfer Regulations*") con riferimento al trattamento dei dati personali degli interessati al trattamento/utenti (di seguito gli "Utenti" o singolarmente l'"Utente") che effettuano il download, accedono e utilizzano l'APP mobile "E4Life" (di seguito "APP").

Si invitano gli Utenti a leggere attentamente la presente Informativa prima di installare l'APP e/o registrarsi sull'APP.

1. IL TITOLARE DEL TRATTAMENTO DEI DATI PERSONALI

Si informa che il titolare del trattamento è la società ELETTRONICA S.p.A. (P. Iva 00886951003), con sede legale in Roma, via Tiburtina, Valeria km 13,700, e-mail: privacy@e4.life (di seguito, "Elt" o il "Titolare del trattamento"). L'elenco completo dei responsabili del trattamento è disponibile previa richiesta scritta inviata all'indirizzo e-mail sopra indicato.

2. DATI PERSONALI RACCOLTI

Elt tratta i dati forniti dagli Utenti, in conformità con la presente Informativa.

In particolare, per le finalità indicate nell'articolo 3, saranno trattati i seguenti dati: (i) nome e cognome dell'utente, (ii) e-mail, (iii) identificativo del *device* e4life.

I dati sopra indicati vengono trattati solo nella misura in cui risultino necessari per conseguire le finalità descritte al paragrafo 3 della presente Informativa.

I dati personali sono forniti dall'Utente in fase di registrazione. Il loro mancato conferimento impedisce la registrazione dell'Utente.

3. FINALITÀ DEL TRATTAMENTO

Le finalità per le quali viene richiesto all'Utente di fornire a Elt i propri dati personali sono le seguenti:

- a. consentire all'Utente di registrarsi sull'APP;
- b. aggiornare il *firmware* del *device*;
- c. inviare comunicazioni relative al funzionamento e all'aggiornamento del *device* nonché a nuove funzionalità e/o servizi ad esso collegati (tramite e-mail o notifiche push, se consentite dall'Utente);
- d. monitorare e analizzare i dati sull'uso del device/APP, al fine di risolvere errori e/o migliorare ed evolvere il servizio a favore dell'esperienza dell'Utente

4. BASE GIURIDICA DEL TRATTAMENTO

Il Titolare del trattamento tratta i dati personali dell'Utente alle seguenti condizioni:

per le finalità indicate nell'articolo 3 che precede, lettere da a) a d), in quanto necessario ai fini dell'accesso all'APP e per la fruizione del servizio di aggiornamento del firmware tramite l'APP (art. 6, comma 2 del PDPL).

5. MODALITA' DI TRATTAMENTO

I dati personali dell'Utente vengono trattati con il supporto di mezzi informatici e sono protetti attraverso adeguate misure di sicurezza idonee a garantirne la riservatezza e la sicurezza.

In particolare, Elt adotta misure organizzative e tecniche appropriate per proteggere i dati personali in suo possesso, volte ad impedire la perdita e distruzione dei dati personali nonché l'accesso, la divulgazione, la modifica non autorizzati degli stessi.

6. AMBITO DI COMUNICAZIONE E DIFFUSIONE DEI DATI

Elt, per le finalità di cui all'articolo 3 potrà comunicare i dati degli Utenti, in stretta correlazione con le finalità del trattamento illustrate, alle seguenti categorie di soggetti:

- ai collaboratori, dipendenti e fornitori di Elt, nell'ambito delle relative mansioni e/o di eventuali obblighi contrattuali con loro, inerenti i rapporti commerciali con gli Utenti;
- ai fornitori e/o subfornitori/subappaltatori impegnati in attività connesse all'esecuzione dei servizi e prodotti offerti da Elt;
- alle altre società del gruppo "Elettronica Group" in Arabia Saudita, Italia e all'estero, nazionali ed internazionali, secondo le modalità di cui al paragrafo 7 che segue.

I dati personali dell'Utente non sono diffusi a soggetti indeterminati, diversi da quelli di cui sopra.

7. TRATTAMENTO DI DATI PERSONALI AL DI FUORI DELL'ARABIA SAUDITA.

Per raggiungere le finalità di cui alla presente Informativa, i dati personali potranno essere trasferiti fuori dal territorio nazionale a Paesi situati nell'Unione europea ovvero a soggetti collocati al di fuori dell'Arabia Saudita.

L'eventuale trasferimento dei dati personali dell'Utente in Paesi situati al di fuori dell'Arabia Saudita avverrà

, in ogni caso, in conformità alle leggi vigenti, senza pregiudicare i diritti dell'Utente previsti dalla legge.

Ove applicabili, Elt utilizzerà le garanzie di protezione dei dati personali previste dagli articoli 5 e ss. del *Data Transfer Regulations*, quali, a titolo meramente esemplificativo, le clausole contrattuali standard. In altri casi, il trasferimento dei dati personali potrà essere basato su una decisione di adeguatezza ai sensi dell'art. 3 del *Data Transfer Regulations*. L'Utente può ottenere copia delle garanzie implementate da Elt, approvate dalle autorità competenti, tramite l'invio di apposita richiesta all'indirizzo privacy@e4.life

8. TEMPI DI CONSERVAZIONE DEL DATO

Elt tratterrà i dati personali per il periodo necessario a soddisfare le finalità per le quali gli stessi sono stati raccolti ai sensi della presente Informativa.

Al fine di determinare i periodi di conservazione più appropriati per i dati personali degli Utenti, Elt ha preso in particolare considerazione, tra l'altro, la quantità, la natura e la sensibilità dei dati personali ed i motivi per cui sono stati raccolti.

Per esempio:

- i dati raccolti per le finalità a), b), c), di cui all'articolo 3 che precede, vengono conservati fino alla cancellazione del profilo, che può essere fatta disinstallando l'App, oppure tramite richiesta scritta all'indirizzo e-mail privacy@e4.life salvo che ragioni legittime non richiedano una conservazione ulteriore;
- i dati raccolti per la finalità d), di cui all'articolo 3 che precede, sono connessi con l'ID del device e, una volta cancellati i dati del profilo (venendo a mancare la connessione utente-device) vengono conservati a titolo permanente in quanto non più riconducibili all'utente.

9. DIRITTI DEGLI UTENTI

L'Utente potrà, in ogni momento, esercitare i diritti di cui agli artt. 4 e ss. del "*Personal Data protection Law*" (adottato ai sensi del Regio Decreto n. (M/19) del 09/02/1443 AH corrispondente al 16/09/2021 G modificato ai sensi del Regio Decreto n. (M/148) del 05/09/1444 AH corrispondente al 27/ 03/2023G) e 3 e ss. dell' *Implementing Regulation of the Personal Data Protection Law* e, in particolare: accedere ai tuoi dati personali, chiedere la rettifica e/o la cancellazione delle informazioni che conserviamo/elaboriamo su di te, opporsi al trattamento dei propri dati, richiedere una copia delle informazioni che conserviamo/elaboriamo su di te, revocare il consenso al trattamento delle tue informazioni (nella misura in cui tale trattamento sia basato sul consenso), ottenere la limitazione del trattamento dei tuoi dati da parte nostra, chiedere che i dati personali forniti vengano trasferiti a sé stesso o a terzi, in formati leggibili da una macchina, e chiedere la portabilità dei dati.

Alcuni di questi diritti non sono assoluti: non sempre si applicano e possono essere previste eccezioni. Elt potrebbe, in risposta a una richiesta, chiedere all'utente di verificare la propria identità e di fornire informazioni che aiutino Elt a comprendere meglio la sua richiesta.

L'Utente può esercitare i diritti di cui sopra, modificare le modalità di contatto, notificare a Elt eventuali aggiornamenti dei propri dati, richiedere la cancellazione del profilo od ottenere ulteriori informazioni circa l'uso da parte di Elt dei propri dati personali, contattando Elt all'indirizzo e-mail privacy@e4.life.

Altrimenti, per tutelare i propri diritti, può contattare la "*Saudi Data & AI Authority*" all'e-mail: dmo@sdaia.gov.sa.

10. MODIFICHE E AGGIORNAMENTI

La presente Informativa è valida dalla data di sua pubblicazione sulla APP. Elt potrebbe apportare modifiche e/o integrazioni alla stessa, anche quale conseguenza di eventuali successive modifiche e/o integrazioni normative. L'ultima versione della nostra Informativa è sempre disponibile sull'apposita sezione presente sull'APP.

ELETTRONICA S.p.A.

5. كفاءة المعالجة

تتم معالجة البيانات الشخصية للمستخدم بواسطة أجهزة معلوماتية وتتم حمايتها من خلال تبني إجراءات الأمانة اللازمة المناسبة لضمان خصوصيتها وسلامتها. على وجه التحديد، تدير الشركة إجراءات تنظيمية وفنية مناسبة لحماية البيانات الشخصية التي تخضع لهذه الإجراءات إلى منع فقدان وتدمير البيانات الشخصية و90% منع دخول و"وتعديل البيانات نفسها دون ترخيص.

6. نطاق توصيل البيانات و [TS

- لتحقيق الأغراض المنصوص عليها في المادة (3) يجوز للشركة إلتزام الأطراف التي وصفها بـ ACEات المستخدم 7: 8 ذات الصلة الوثيقة N الأغراض من المعالجة المشار إليها أعلاه:
- متعاو: الشركة إلتزام وموظفيها ومزوديها، في إطار الوظائف المسندة إليهم وأولاً إلا أن الامتثال التعاقدية المحتملة معهم ذات الصلة N العلاقات التجارية مع المستخدم 7: 8.
- الشركة إلتزامات الموردة وأو الموردة من اللابن وأو المقابلة من اللابن العاملة على "شركات مرتبطة بـ N الخدمات والمنتجات المتاحة من قبل الشركة إلتزام.
- الشركة إلتزامات الأخرى التابعة لمجموعة Elettronica Group في إيطاليا والخارج، سواء أكانت وطنية أو دولية، بناء على المنهجيات المشار إليها في المادة (7) المنقولة أدناه.
- لا يجوز للشركة البيانات الشخصية للمستخدم إلى أطراف غير n7 محددة تختلف عن الأطراف المذكورة أعلاه.

7. معالجة البيانات الشخصية خارج الاتحاد الأوروبي

- لتحقيق الأغراض المنصوص عليها في هذه المذكرة الإعلامية، يجوز تحليل البيانات الشخصية خارج الأراضي الوطنية إلى بلدان قائمة ضمن الاتحاد الأوروبي. الشركة أو إلى أطراف قائمة خارج المنطقة الاقتصادية الأوروبية (المعروفة بـ EEA).
- على أي حال، يتم تحليل البيانات الشخصية للمستخدم إلى بلدان قائمة خارج منطقة EEA بناء على القواعد 7: 8 المعمول بها مع عدم الإضرار بحقوق المستخدم المنصوص عليها في القانون.
- أستخدم الشركة إلتزام الضمانات الخاصة بحماية البيانات الشخصية المنصوص عليها في المادة 46 وما يليها من لائحة GDPR إن كانت تنطبق، أما في ذلك على سACEال المثال لا الحز البنود التعاقدية الاعتراف. أما في أحوال أخرى فـ يجوز تحليل البيانات الشخصية على أساس قرار كفاءة بناء على المادة 45 من لائحة GDPR. يُسمح للمستخدم للحصول على نسخة من الضمانات المنفذة من قبل الشركة إلتزام والشركة f صادقت عليها السلطات المختصة من خلال إرسال طلب خاص N الأمر إلى عنوان الـ privacy@e4.life.

8. سياسة الاحتفاظ بالبيانات

- تحتفظ الشركة إلتزام البيانات الشخصية للفرد n اللازمة للوفاء N الأغراض التي قد تطلبت جمع البيانات نفسها بناء على هذه المذكرة الإعلامية.
- من 7: 8 الأمور المفيدة لتحديد الفئات الأوسع للاحتفاظ N البيانات الشخصية للمستخدم 7: 8، تركزت الشركة إلتزام وشركة خاص على أمانة البيانات الشخصية وطبيعتها وحساسيتها وسلب جمعها.
- على سACEال المثال:
- يتم الاحتفاظ N البيانات الشخصية المجموعة للأغراض المشار إليها في الفقرات (أ) و(ب) و(ج) من المادة (3) المنقولة أعلاه f حذف الحساب الشخصي، ويمكن حذف الحساب من خلال إلغاء تقييد التطبيق أو

عن طريق طلب كتابي. يرجى إرسال عنوان البريد الإلكتروني إلى privacy@e4.life ، ما لم توجد أساليب أخرى.
تتطلب الاحتفاظ بالبيانات لفترة أطول.

- تعد البيانات الشخصية المجموعة للأغراض المشار إليها في الفقرة (د) من المادة (3) المنقولة أعلاه مرتبطة برقم التسلسل للجهاز، ويتم الاحتفاظ بها بشكل دائم حتى يتم حذف بيانات الحساب الشخصي وذلك بموجب انتهاء الصلة بـ 7-8 المستخدم والجهاز واستحالة ربط البيانات نفسها للمستخدم.

9. حقوق المستخدم $r^p q$

يجوز للمستخدم أن يمارس أي وقت الحقوق المنصوص عليها في المواد 7-8 (15-22) من لائحة GDPR، وعن وجه التحديد الحقوق التالية: دخول بياناتك الشخصية، وطلب تصحيح أو حذف البيانات الخاصة بك. سيتم صياغتها للاحتفاظ بها، والاعراض عن معالجة بياناتك، وطلب نسخة من المعلومات الخاصة بك. سيتم صياغتها للاحتفاظ بها، والاعراض عن الموافقة على معالجة بياناتك (طالما تعتمد هذه المعالجة على الموافقة)، والحصول على الحد من معالجة بياناتك، وطلب حذف البيانات الشخصية الموفرة إلى أنفسكم أو إلى أطراف ثالثة بواسطة ملفات قادمة للقراءة على حاسوب، وطلب حذف البيانات.
تعد بعض هذه الحقوق غير مطلقة، فلا يتم تلطيغها دائماً وقد تكون هناك بعض الاستثناءات. يرجى إطلاعك على طلب صادر عن المستخدم، قد تطلب إزالة المستخدم نفسه تماماً. هذه المعلومات متوفرة لمدة 7-8.
إزالة من فهم الطلب بشكل أفضل.

كما يجب للمستخدم أن يمارس أي وقت الحقوق المنصوص عليها في المواد 7-8 (15-22) من لائحة GDPR، وعن وجه التحديد الحقوق التالية: دخول بياناتك الشخصية، وطلب تصحيح أو حذف البيانات الخاصة بك. سيتم صياغتها للاحتفاظ بها، والاعراض عن معالجة بياناتك، وطلب نسخة من المعلومات الخاصة بك. سيتم صياغتها للاحتفاظ بها، والاعراض عن الموافقة على معالجة بياناتك (طالما تعتمد هذه المعالجة على الموافقة)، والحصول على الحد من معالجة بياناتك، وطلب حذف البيانات الشخصية الموفرة إلى أنفسكم أو إلى أطراف ثالثة بواسطة ملفات قادمة للقراءة على حاسوب، وطلب حذف البيانات.
تعد بعض هذه الحقوق غير مطلقة، فلا يتم تلطيغها دائماً وقد تكون هناك بعض الاستثناءات. يرجى إطلاعك على طلب صادر عن المستخدم، قد تطلب إزالة المستخدم نفسه تماماً. هذه المعلومات متوفرة لمدة 7-8.
إزالة من فهم الطلب بشكل أفضل.

يجوز للمستخدم أن يمارس الحقوق المذكورة أعلاه، وأن يعدل كفاءات التواصل، وأن يشعر إزالة أي تحديثات محتملة للبيانات الشخصية، وأن يطلب حذف الحساب الشخصي، وأن يحصل على المزيد من المعلومات حول استخدام بياناته الشخصية من قبل إزالة، وألذلك من خلال الاتصال أو إزالة من نفسها عن عنوان البريد الإلكتروني privacy@e4.life.

10. التعديلات والتحديثات

تعد هذه المذكرة الإعلامية سارية المفعول ابتداءً من تاريخ نشرها على التطبيق. قد تنفذ إزالة تعديلات أو تحديثات على التطبيق نفسه وذلك أيضاً. إذا كانت أي تعديلات أو تحديثات محتملة قد تحدث لاحقاً، يمكن الاطلاع على الصفحة الأخيرة من مذكرتنا الإعلامية في أي وقت على الصفحة المخصصة الموجودة في التطبيق.

ELETRONICA S.p.A. شركة

5. كفاءة المعالجة

تتم معالجة البيانات الشخصية للمستخدم بواسطة أجهزة معلوماتية وتتم حمايتها من خلال تبني إجراءات الأمانة اللازمة المناسبة لضمان خصوصيتها وسلامتها. علماً وجه التحديث، تبني الفكرة إجراءات تنظيمية وفنية مناسبة لحماية البيانات الشخصية التي يجوزتها، وتهدف هذه الإجراءات إلى منع فقدان وتدمير البيانات الشخصية و%10 منع دخول و، وتعدّل البيانات نفسها دون ترخيص.

6. نطاق توصيل البيانات و [TS

- لتحقيق الأغراض المنصوص عليها في المادة (3) يجوز للجهة الأطراف التي وصفها بـ ACE المستخدم 7: 8 ذات الصلة الوثيقة الأغراض من المعالجة المشار إليها أعلاه:
- متعاو: الفكرة Elt وموظفيها ومورديها، في إطار الوظائف المسندة إليهم وأو الإلزامات التعاقدية المحتملة معهم ذات الصلة بالعلاقات التجارية مع المستخدم 7: 8.
- الإلزامات الموردة وأو الموردة من اللابن وأو المقابلة من اللابن العاملة علماً، نشاطات مرتبطة بتنفيذ الخدمات والمنتجات المتاحة من قبل الفكرة Elt.
- الإلزامات الأخرى التابعة لمجموعة Electronica Group في الإمارات العربية المتحدة و%10 طالباً والخارج، سواء أغانٍ وطنية أو دولية، بناء على المنهجيات المشار إليها في المادة (7) المنقولة أدناه.
- لا يجوز للجهة البيانات الشخصية للمستخدم إلى أطراف غير محددة تختلف عن الأطراف المذكورة أعلاه.

7. معالجة البيانات الشخصية خارج الإمارات العربية المتحدة

- لتحقيق الأغراض المنصوص عليها في هذه المذكرة الإعلامية، يجوز تحاليل البيانات الشخصية خارج الأراضي الوطنية إلى بلدان قائمة ضمن الاتحاد الأوروبي. أو إلى أطراف قائمة خارج الإمارات العربية المتحدة.
- علماً أي حال، يتم تحاليل البيانات الشخصية للمستخدم إلى بلدان قائمة خارج الإمارات العربية المتحدة بناء على القواعد 7: 8 المعمول بها مع عدم الإضرار بحقوق المستخدم المنصوص عليها في القانون.
- أستخدم الفكرة Elt الضمانات الخاصة بحماية البيانات الشخصية المنصوص عليها في المادة 23 من المرسوم إن أمّنت تنطبق، بما في ذلك علماً سـ ACE المثل لا الحز البنود التعاقدية الاعترافية. أما في أحوال أخرى فـ يجوز تحاليل البيانات الشخصية علماً أساس قرار كفاءة بناء المادة 22 من المرسوم. يُسمح للمستخدم للحصول على نسخة من الضمانات المنفذة من قبل الفكرة Elt والجهة صادقت عليها السلطات المختصة من خلال إرسال طلب خاص بالأمر إلى عنوان الـ in. الـ إلى privacy@e4.life.

8. في الاحتفاظ بالبيانات

- تحتفظ الفكرة Elt بالبيانات الشخصية للفرد اللازمة للوفاء للأغراض التي قد تطلبت جمع البيانات نفسها بناء على هذه المذكرة الإعلامية.
- من 7: 8 الأمور المفيدة لتحديد الفئات السبب للاحتفاظ بالبيانات الشخصية للمستخدم 7: 8، تركزت الفكرة Elt بشكل خاص على أمانة البيانات الشخصية وطبيعتها وحساسيتها وسلب جمعها.
- علماً سـ ACE المثل:

- يتم الاحتفاظ بالبيانات الشخصية المجموعة للأغراض المشار إليها في الفقرات (أ) و(ب) و(ج) من المادة (3) المنقولة أعلاه في حذف الحساب الشخص، ويمكن حذف الحساب من خلال إلغاء تطبيقات التطبيق أو عن طريق طلب كتابي مرسل إلى عنوان الـ in. الـ إلى privacy@e4.life، ما لم توجد أسباب أمنية تتطلب الاحتفاظ بالبيانات لفترات أطول.

^٨ يجوز للمستخدم أن يمارس f_c أي وقت الحقوق المنصوص عليها f_c المرسوم، وعلا وجه التحديد الحقوق التالية:

دخول بياناتهم الشخصية، وطلب تصحيح أو حذف البيانات الخاصة بهم N . f_c يتم صياغتها للاحتفاظ بها، والاعراض علا معالجة بياناتهم، وطلب نسخة من المعلومات الخاصة بهم N . f_c يتم صياغتها للاحتفاظ بها، والاجماع عن الموافقة علا معالجة بياناتهم (طالما تعتمد هذه المعالجة علا الموافقة)، والحصول علا الحد من معالجتنا لبياناتهم، وطلب تحايل البيانات الشخصية الموفرة إل أنفسهم أو إل أطراف ثالثة بواسطة ملفات قانلة للقراءة علا حاسوب، وطلب تحايل البيانات.

٨ يجوز للمستخدم أن يمارس الحقوق المذكورة أعلاه، وأن يعدل كائنات التواصل، وأن يشعر بـ "كافة" أي تحديثات محتملة للبيانات الشخصية، وأن يطلب حذف الحساب الشخصي، وأن يحصل على المآخذ من المعلومات حول استخدام بياناته الشخصية من قِـال "كافة" Elt، وأمل ذلك من خلال الاتصال بـ "كافة" Elt نفسها بـ n. عنوان الـ in. الـ لإلـ privacy@e4.life.

10. التعديلات والتحديثات

n. هذه المذكرة الإعلامية سارئة المفعول ابتداءً من تاريخ " /ها على التطبيق. قد تنفذ Elt^{β} كمالات و $\hat{a}^0$ أو كمالات على التطبيق نفسه وذلك أيضاً. ان $A\hat{a}^0$ أية كمالات و $\hat{a}^0$ أو كمالات $\hat{A}$ $Aeiv^{\beta}$ محتملة قد تحدث لاحقة $\hat{a}^q$. يمكن الاطلاع على الصيغة الأخ $n7$ من مذكرتنا الإعلامية f^* أى وقت على الصفحة المخصصة الموجودة f^* التطبيق.

ELETTRONICA S.p.A. سكة S

المذكرة الإعلامية الخاصة بتطبيق E4Life الجديدة إلى معالجة البيانات الشخصية للمستخدم q r الذين يقومون بـ
 p p m r ودخول واستخدام التطبيق p e أو p a المملكة العربية السعودية



تُنقل المعلومات التالية بناءً على المادة (1) من الفقرة (4) من نظام حماية البيانات الشخصية الصادر
 N/المرسوم الملحق رقم 19 (م19) المؤرخ 16/9/2021م والتعديلات اللاحقة عليه (المشار إليه من الآن فصاعداً N/مختز PDPL)
 والمادة (4) من اللائحة التنفيذية السارئة المفعول اعتباراً من تاريخ 6/9/2023م (المشار إليها من الآن
 فصاعداً N/اللائحة التنفيذية) واللائحة نقل البيانات الشخصية السارئة المفعول اعتباراً من تاريخ 6/9/2023م
 (المشار إليها من الآن فصاعداً N/اللائحة نقل البيانات) إلى معالجة البيانات الشخصية لمن تهمه المعالجة
 المستخدم 7 8 (المشار إليهم من الآن فصاعداً N/المستخدم 7 8 "أو شقائل فردي N/المستخدم") الذين يقومون بتسجيل
 ودخول واستخدام التطبيق المحمول "E4Life" (المشار إليه من الآن فصاعداً N/التطبيق).
 يُستخدم المستخدمون لإجراء هذه المذكرة الإعلامية شقائل دقيق قال تقيمت التطبيق ودأو التسجيل
 4N.

1. صاحب معالجة الب4انات الشخصية

نعلمكم أن صاحب معالجة البيانات الشخصية هو ^١ ELETTRONICA S.p.A. المساهمة (رقم ^٢ Liù القامة المضافة 00886951003)، ومقرها القانوني ^٣ f روما عنوان 13,700 Via Tiburtina Valeria، وعنوانها للـ ^٤ in الإلكتروني ^٥ gn@e4.life privacy (المشار إليها من الآن فصاعداً ^٦ Elt أو ^٧ N "صاحب المعالجة"). تتاح القائمة ^٨ الـ ^٩ المسؤولية 8 عن المعالجة عند إرسال طلب كتابي ^{١٠} إلى عنوان الـ ^{١١} in الإلكتروني ^{١٢} gn@e4.life المذكور أعلاه.

2. معالجة البيانات الشخصية المجموعة

تعالج بطاقة EIt البيانات الصادرة عن المستخدم 7 8٠ بناء على بطاقة وط هذه المذكرة الإعلامية.

على وجه التحديد، MAlN مسالة للأغراض المشار إليها fC المادة 3، تتم معالجة البيانات التالية: (أ) الاسم الكامل للمستخدم (ب) عنوان الـ in. ind الإلـ on . A (ج) رقم أسلسل جهاز e4life.

لا تتم معالجة البيانات المذكورة أعلاه إلى N À القدر اللازم لتحقيق الأغراض الموضحة fC المادة (3) من هذه المذكرة الإعلامية.

يوفر المستخدم بهاناته الشخصية f_c مرحلة التسجيل. f_c يمنع المستخدم من التسجيل f_c حال عدم توفر $n7$ البيانات.

3. الأغراض من المعالجة

١١٠ مطلب من المستخدم تزويد بـ ACE إاناته الشخصية للأغراض التالية وصفها:

١. تمكّن 70 ٪ المستخدم من التسجيل والتطبيق.
٢. تحدث الـ nامج الثامن للجهاز.
٣. إرسال معلومات بشأن تشغيل الجهاز وتحديثه وخدمات وخدمات ذات الصلة (عن طريق البريد الإلكتروني أو إشعارات الدفع أو السماح للمستخدم بتلقيها).
٤. مراقبة البيانات الخاصة باستخدام التطبيق وتحليلها، لغرض حل الأخطاء وتحسين الخدمة وتحسينها لصالح تجربة المستخدم.

4. الأساس $U^S R T^S Q_p$ للمعالجة

تتم معالجة البيانات الشخصية للمستخدم بواسطة أجهزة معلوماتية وتتم حمايتها من خلال تبني إجراءات الأمانة اللازمة المناسبة لضمان خصوصيتها وسلامتها.

على وجه التحديد، تبنى الشركة إجراءات تنظيمية وفنية مناسبة لحماية البيانات الشخصية التي تحوزها، وتهدف هذه الإجراءات إلى منع فقدان وتدمير البيانات الشخصية و90% منع دخول و"كسر وتعدّل البيانات نفسها دون ترخيص.

لتحقيق الأغراض المنصوص عليها في المادة (3) يجوز لـ شركة Elt تزويد الأطراف التالية وصفها بـ ACEات المستخدم 7 80 ذات الصلة الوثيقة بالأنواع من المعالجة المشار إليها أعلاه:

- متعاونو ACE شركة Elt وموظفيها وموردتها، في إطار الوظائف المسندة إليهم وفقاً للأنشطة التعاقدية المحتملة معهم ذات الصلة بالعلاقات التجارية مع المستخدم 7 80 .
- الإدارات المؤيدة وفقاً للموارد من المواطن وفقاً للمقابلة من المواطن العاملة على "نشاطات مرتبطة بـ تنفيذ الخدمات والمنتجات المتاحة من قبل شركة Elt.
- الإدارات الأخرى التابعة لمجموعة Electronica Group في المملكة العربية السعودية و ٨٠٪ طالبا والخارج، سواء أكانت وطنية أو دولية، بناء على المنهجيات المشار إليها في المادة (7) المنقولة أدناه.

لا يجوز "لـ الإدارات الشخصية للمستخدم الأطراف 7 80 محددة تختلف عن الأطراف المذكورة أعلاه.

لتحقيق الأغراض المنصوص عليها في هذه المذكرة الإعلامية، يجوز تحليل البيانات الشخصية خارج الأراضي الوطنية إلى البلدان قائمة ضمن الاتحاد الأوروبي أو إلى أطراف قائمة خارج المملكة العربية السعودية. على أي حال، يتم تحليل البيانات الشخصية للمستخدم إلى البلدان قائمة خارج المملكة العربية السعودية بناءً على القواعد المعمول بها مع عدم الإضرار بحقوق المستخدم المنصوص عليها في القانون.

أستخدم بكتلة الضمانات الخاصة بحماية البيانات الشخصية المنصوص عليها في المادة (5) وما يليها من لائحة نقل البيانات إن كانت تنطبق، بما في ذلك على سعة المثال لا الحز البنود التعاقدية الاعترافية. أما في الأحوال أخرى فاجوز تحليل البيانات الشخصية على أساس قرار كفاءة بناءً على المادة (3) من لائحة نقل البيانات. يُسمح للمستخدم بالحصول على نسخة من الضمانات المنفذة من قبل بكتلة الضمانات و الف صادقت عليها السلطات المختصة من خلال إرسال طلب خاص للأمر إلى عنوان البريد الإلكتروني: privacy@e4.life.

تحتفظ شبكة Elt بالبيانات الشخصية للفرد n اللازمة للوفاء للأغراض التي f قد تطلبت جمع البيانات نفسها بناء على هذه المذكرة الإعلامية.

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Politique de confidentialité de l'application mobile E4Life, concernant le traitement données personnelles des personnes concernées qui téléchargent, accèdent et utilisent l'application sur le territoire du Maroc.



Les informations suivantes sont fournies conformément a) au Règlement (UE) 2016/679 ("GDPR") et au Code de protection des données personnelles (Décret législatif n° 196 du 30 juin 2003); et b) à la Loi n° 09-08, en date du 18 février 2009, relative à la protection des individus à l'égard du traitement des données personnelles et à son décret d'application n° 2-09-165 du 21 mai 2009 ("Loi marocaine sur la protection des données") (§ 10 de cet Avis). Les clients marocains doivent lire les sections ci-dessous relatives à E4LIFE, car elles contiennent des informations importantes concernant le traitement des données personnelles des personnes concernées/ utilisateurs (ci-après désignés "Utilisateurs" ou individuellement "Utilisateur") qui téléchargent, accèdent et utilisent l'application mobile "E4Life" (ci-après "APP").

Les utilisateurs sont invités à lire attentivement cet Avis avant d'installer l'APP et/ou de s'inscrire sur l'APP.

1. RESPONSABLE DU TRAITEMENT DES DONNÉES

Veuillez noter que le responsable du traitement des données est la société ELETTRONICA S.p.A. (numéro de TVA 00886951003, ayant son siège social à via Tiburtina, Valeria km 13,700, Rome, ci-après dénommée "Elt" ou le "Responsable du traitement") email: privacy.e4lifecorporate@e4life.it. La liste complète des responsables du traitement des données est disponible sur demande écrite envoyée à l'adresse email indiquée ci-dessus.

2. DONNÉES PERSONNELLES COLLECTÉES

Elt traite les données fournies par les Utilisateurs conformément à cet Avis.

En particulier, aux fins indiquées à l'Article 3, les données suivantes seront traitées: (i) nom et prénom de l'Utilisateur, (ii) adresse e-mail, (iii) identifiant du dispositif E4Life.

Les données susmentionnées sont traitées uniquement dans la mesure nécessaire pour atteindre les objectifs décrits au paragraphe 3 de cet Avis.

Les données personnelles sont fournies par l'Utilisateur lors de l'inscription. L'absence de fourniture empêche l'inscription de l'Utilisateur.

3. OBJECTIFS DU TRAITEMENT

Les objectifs pour lesquels les Utilisateurs sont invités à fournir leurs données personnelles à Elt sont les suivants:

- a) Permettre à l'Utilisateur de s'inscrire sur l'APP;
- b) Mettre à jour le micrologiciel du dispositif;
- c) Envoyer des communications relatives au fonctionnement et à la mise à jour du dispositif, ainsi que les nouvelles fonctionnalités et/ou services associés (par e-mail ou notifications push, si autorisé par l'Utilisateur);
- d) Surveiller et analyser les données relatives à l'utilisation du dispositif/APP, afin de résoudre les erreurs et/ou d'améliorer et faire évoluer le service au bénéfice de l'expérience de l'Utilisateur.

4. BASE LÉGALE DU TRAITEMENT

Le Responsable du traitement traite les données personnelles de l'Utilisateur dans les conditions suivantes:

- a) Aux fins indiquées à l'Article 3, lettres a) à c), nécessaires pour accéder à l'APP et utiliser le service de mise à jour du micrologiciel via l'APP (art. 6, paragraphe 1, lettre b), GDPR);
- b) Aux fins indiquées à l'Article 3, lettre d), pour poursuivre l'intérêt légitime du Responsable du traitement (art. 6, lettre f), GDPR).

5. MODALITÉS DE TRAITEMENT

Les données personnelles des Utilisateurs sont traitées avec le support de moyens informatisés et protégées par des mesures de sécurité adéquates garantissant la confidentialité et la sécurité.

En particulier, Elt adopte des mesures organisationnelles et techniques appropriées pour protéger les données personnelles en sa possession, visant à prévenir l'accès non autorisé, la divulgation, l'altération, la perte et la destruction de ces données.

6. PORTÉE DE LA COMMUNICATION ET DE LA DIVULGATION DES DONNÉES

Pour les objectifs décrits à l'Article 3, Elt peut divulguer les données des Utilisateurs, en stricte relation avec les objectifs de traitement, aux catégories d'entités suivantes:

- Collaborateurs, employés et fournisseurs d'Elt dans le cadre de leurs responsabilités respectives et/ou de toute obligation contractuelle relative aux relations commerciales avec les Utilisateurs.
- Fournisseurs et/ou sous-traitants/filiales engagés dans des activités liées à l'exécution des services et produits offerts par Elt.
- Autres sociétés du "Groupe Elettronica" en Italie et à l'étranger, tant au niveau national qu'international, comme détaillé à la section 7 ci-dessous. Les données personnelles des utilisateurs ne seront pas divulguées à des tiers non spécifiés ci-dessus.

7. TRAITEMENT DES DONNÉES PERSONNELLES HORS DU MAROC

Pour atteindre les objectifs décrits dans cet Avis, les données personnelles peuvent être transférées hors du territoire national (Maroc) vers des pays situés au sein de l'Union Européenne ou vers des entités situées en dehors de l'Espace économique européen ("EEE").

Le transfert éventuel des données personnelles des Utilisateurs vers des pays hors du Maroc sera en tout état de cause effectué en conformité avec les lois applicables, sans préjudice des droits de l'Utilisateur tels que prévus par la loi.

Le cas échéant, Elt utilisera des garanties de protection des données prévues aux articles 46 et suivants du GDPR, telles que, par exemple, des clauses contractuelles types. Dans d'autres cas, le transfert des données personnelles peut être basé sur une décision d'adéquation au sens de l'article 45 du GDPR. L'Utilisateur peut obtenir une copie des garanties mises en place par Elt, approuvées par les autorités compétentes, en envoyant une demande spécifique à l'adresse privacy.e4lifecorporate@e4life.it.

8. PÉRIODE DE CONSERVATION DES DONNÉES

Elt conservera les données personnelles pendant la période nécessaire pour atteindre les objectifs pour lesquels elles ont été collectées, comme décrit dans cet Avis.

Pour déterminer les périodes de conservation les plus appropriées pour les données personnelles des Utilisateurs, Elt a pris en compte, entre autres, la quantité, la nature et la sensibilité des données personnelles, ainsi que les raisons pour lesquelles elles ont été collectées.

Par exemple:

- Les données collectées pour les finalités a), b), c) de l'Article 3 ci-dessus seront conservées jusqu'à la suppression du profil, qui peut être effectuée en désinstallant l'App ou en envoyant une demande écrite à l'adresse e-mail privacy.e4lifecorporate@e4life.it, sauf si des raisons légitimes imposent une conservation plus longue.
- Les données collectées pour la finalité d) de l'Article 3 ci-dessus sont associées à l'identifiant du dispositif et, une fois les données du profil supprimées (déconnexion du lien utilisateur-dispositif), elles sont conservées de manière permanente, car elles ne sont plus attribuables à un utilisateur.

9. DROITS DE L'UTILISATEUR

L'Utilisateur peut, à tout moment, exercer les droits prévus aux articles 15 à 22 du GDPR, y compris : l'accès aux données personnelles, la demande de rectification et/ou de suppression des informations que nous détenons/traitons à votre sujet, s'opposer au traitement de vos données, demander une copie des informations que nous détenons/traitons à votre sujet, retirer le consentement au traitement de vos informations (dans la mesure où ce traitement est basé sur le consentement), obtenir la limitation du traitement de vos données par nos soins, demander que les données personnelles que vous nous avez fournies vous soient transférées ou à des tiers dans des formats lisibles par machine, et demander la portabilité des données.

L'Utilisateur a également le droit d'introduire une réclamation auprès de l'Autorité de contrôle (en Italie, c'est l'Autorité italienne de protection des données) ayant sa siège à Piazza Venezia 11, Rome (00187) et e-mail protocollo@gpdp.it, ou auprès d'une autre autorité de contrôle de la protection des données dans le pays où vous résidez.

L'Utilisateur peut exercer les droits ci-dessus, modifier les préférences de contact, notifier à Elt toute mise à jour de ses données, demander la suppression du profil ou obtenir de plus amples informations sur l'utilisation de ses données personnelles par Elt en contactant Elt à l'adresse e-mail privacy.e4lifecorporate@e4life.it.

Certains de ces droits ne sont pas absolus, peuvent ne pas toujours s'appliquer et des exceptions peuvent être autorisées. En réponse à une demande, Elt peut demander à l'Utilisateur de vérifier son identité et de fournir des informations pour aider Elt à mieux comprendre la demande.

10. POLITIQUE DE CONFIDENTIALITÉ (supplément uniquement pour les résidents du Maroc)

Cette section complète les informations contenues dans notre Politique de confidentialité et s'applique uniquement au traitement des informations personnelles des consommateurs marocains (elle ne s'applique pas aux informations personnelles relatives à l'emploi recueillies auprès des employés, candidats, sous-traitants ou personnes similaires basées au Maroc). Cette section est destinée à répondre aux exigences de notification pertinentes de la Loi marocaine sur la protection des données et utilise certains termes ayant la signification donnée dans ladite loi.

DROITS DE L'UTILISATEUR

Sous réserve d'exceptions prévues par la loi applicable, vous pouvez avoir certains choix concernant notre utilisation et divulgation de vos informations personnelles, comme décrit ci-dessous:

- Conformément à l'article 7 de la Loi marocaine sur la protection des données, vous avez le droit de demander que nous vous communiquions les informations personnelles que nous avons recueillies à votre sujet ainsi que des détails concernant notre collecte, utilisation et divulgation de ces informations.
- De plus, conformément à l'article 8 de la Loi marocaine sur la protection des données, vous avez le droit de demander la mise à jour, la correction ou la suppression des informations personnelles que nous avons recueillies auprès de vous, sous réserve de certaines exceptions.
- Vous avez également le droit de gérer l'activation des cookies, comme décrit dans la section sur les cookies (le cas échéant).

Pour exercer vos droits décrits ci-dessus, vous pouvez nous contacter directement à l'adresse indiquée ci-dessus (privacy.e4lifecorporate@e4life.it). Si vous exercez vos droits, nous pourrions vous demander de fournir certaines informations pour vérifier votre identité (telles que votre nom, adresse e-mail, numéro de téléphone et/ou adresse).

11. MODIFICATIONS ET MISES À JOUR

Cet Avis est en vigueur à compter de la date de sa publication sur l'APP. Elt peut apporter des modifications et/ou des ajouts à cet avis, également à la suite de modifications législatives et/ou d'ajouts ultérieurs. La dernière version de notre Avis est toujours disponible dans la section dédiée de l'APP.

ELETTRONICA S.p.A

E4Life APP プライバシーポリシー

(日本)



以下の情報は、EU規則2016/679（以下「GDPR」）および個人情報保護に関するイタリアの法律（2003年6月30日制定法令第196号）、およびb) 日本における個人情報の収集、利用、開示を規制する日本の個人情報保護法（2003年制定第57号法）（以下「APPI」）に従って提供されています。モバイルアプリ「E4Life」（以下、「アプリ」）をダウンロード、アクセス、使用するデータ主体/ユーザー（以下、「ユーザー」）の個人情報の処理に関する重要な情報が含まれていますので、E4LIFEに関連する以下のセクションを必ずお読みください。

アプリをインストールしたり、アプリに登録する前に、本通知をよくお読みになることが推奨されます。

1. データ管理者

データ管理者は、ELETTRONICA S.p.A.（VAT番号00886951003、登録事務所所在地：via Tiburtina, Valeria km 13,700, Rome、以下「Elt」または「データ管理者」、電子メールアドレス：privacy.e4lifecorporate@e4life.it）です。データ処理管理者の全リストは、上記のメールアドレスに書面により請求いただければ提供可能です。

2. 収集された個人情報

Elt は、本通知に従い、ユーザーから提供されたデータを処理します。

具体的には、第3条に記載された目的のため、(i) ユーザーの氏名、(ii) 電子メールアドレス、(iii) e4lifeデバイス識別子を処理します。

上記のデータは、本通知の第3項に記載された目的を達成するために必要な範囲内で処理されます。

個人情報は、登録時にユーザーが提供するものです。データの提供がないと、ユーザー登録を行えません。

3. 処理の目的

Eltに個人情報を提供するように求められる目的は次の通りです。

- a) ユーザーがアプリに登録できるようにする。
- b) デバイスのファームウェアを更新する。
- c) デバイスの操作と更新、およびデバイスに関連する新機能やサービスに関する通知を送信する（ユーザーが許可した場合、電子メールまたはプッシュ通知を使用）。
- d) デバイス/アプリの使用に関するデータを監視および分析し、エラーを解決したり、ユーザー体験を向上させるためにサービスを改善、進化させる。

4. 処理の法的根拠

データ管理者は、以下の条件の下、ユーザーの個人情報を処理します。

- a) 上記第3条のa)からc)に記載された目的で、アプリへのアクセスおよびアプリを介したファームウェア更新サービスの使用に必要な場合（GDPR第6条第1項b）。
- b) 上記第3条d)に記載された目的で、データ管理者の正当な利益を追求するため（GDPR第6条f）。

5. 処理方法

ユーザーの個人情報は、コンピューターを使用して処理され、機密性とセキュリティの確保に適したセキュリティ対策によって保護されます。

特に、Eltは、不正なアクセス、開示、改ざん、紛失、および破壊を防止することを目的とし、APPIにも準拠した適切な組織的および技術的措置を採用して所有する個人情報を保護します。

6. データの通知および開示の範囲

第3条に記載されている目的のため、Eltは処理目的と厳密に関連したユーザーの情報を、以下のカテゴリーの団体に開示することができます。

- それぞれの職務や、ユーザーとの商業的関係に関連する契約上の義務の範囲内におけるEltの協力者、従業員、サプライヤー。
- Eltが提供するサービスの遂行および製品に関連する活動に従事するサプライヤーおよび下請け業者/子会社。
- 日本国外で個人情報を処理する「Elettronica Group」に属する他の企業。Eltは、個人情報の処理に関与する第三者がAPPIの要件を満たしていることを保証します。

ユーザーの個人情報は、上記以外の不特定の第三者に開示されることはありません。

7. 日本国外での個人情報の処理

本通知に記載された目的を達成するため、個人情報は、国（日本）の領域外の欧州連合（「EU」）/欧州経済領域（「EEA」）内またはEU/EEA外にある組織に転送されます。

ユーザーの個人情報は、いかなる場合においても適用法に準拠し、法律で定められたユーザーの権利を損なうことなく、日本国外に移転されます。

該当する場合、Eltは標準契約条項など、GDPRの第46条以降に規定されているデータ保護措置を使用します。その他の場合、個人情報の移転は、GDPRの第45条に基づき、妥当性の決定に基づいて行われます。ユーザーは、管轄当局によって承認され、Eltが実施する保護対策のコピーを入手することができます。privacy.e4lifecorporate@e4life.it宛てに特定のリクエストを送信してください。

さらに、該当する場合、Eltは、APPIが要求するのと同レベルの保護を確保されるよう、日本国外に移転される個人情報が契約上の合意などの適切な保護措置の対象となるようにします。

8. データの保持期間

Eltは、本通知に記載されている通り、収集目的を達成するために必要な期間、個人情報を保持します。

ユーザーの個人情報に最も適切な保持期間を決定するため、Eltでは個人情報の量、性質、機密性、および収集された理由などの要因を考慮しました。例：

- 上記第3条の目的 a)、b)、c) のために収集されたデータは、さらに長期間保持する正当な理由がない限り、アプリをアンインストールするか、電子メールアドレス privacy.e4lifecorporate@e4life.it に書面によるリクエストを送信してプロフィールが削除されるまで保持されます。
- 上記の第3条の目的d) のために収集されたデータは、装置IDに関連付けられており、プロフィールデータが削除されると（ユーザーの装置へのリンクが切断される）、ユーザーに帰属なくなるため、永久に保持されます。

9. ユーザーの権利

ユーザーは、いつでも、GDPRの第15条から第22条に規定されている権利を行使できます。これには、個人情報へのアクセス、弊社が保持/処理するユーザーに関する情報の修正や削除の要求、ユーザーのデータの処理に対する異議申し立て、弊社が保持/処理するユーザーに関する情報のコピーの要求、ユーザーの情報の処理に対する同意の撤回（その処理が同意に基づく場合）、弊社によるユーザーデータの処理の制限、弊社に提供された個人情報の機械可読形式でのユーザーまたは第三者への移転要求、およびデータポータビリティの要求が含まれます。

これらの権利の一部は絶対的なものではなく、常時適用されるとは限らず、例外が認められる場合もあります。要求に応じて、Eltはユーザーに対する本人確認、および要求をより理解できるよう情報提供を依頼する場合があります。

また、ユーザーは、監督機関（イタリアではItalian Data Protection Authority：所在地Piazza Venezia 11, Rome (00187)、メールアドレスprotocollo@gpdp.it）または居住される国のデータ保護監督機関に苦情を申し立てる権利を有します。

ユーザーは、上記の権利の行使、連絡先の変更、ユーザーデータのEltへの更新通知、プロフィール削除要求、Eltによる個人情報の使用に関する詳細情報の入手が可能です。メールアドレスprivacy.e4lifecorporate@e4life.itに連絡してください。

これらの権利の一部は絶対的なものではありません。また、常時適用されるとは限らず、例外が認められる場合もあります。要求に応じて、Eltはユーザーに対する本人確認、および要求をより理解できるよう情報提供を依頼する場合があります。

10. プライバシーポリシー（日本在住のみを対象とした補足）

本セクションは、弊社のプライバシーポリシーに記載されている情報を補足するものであり、日本の消費者の個人情報処理にのみ適用されます（日本に拠点を置く従業員、求職者、請負業者、または同様の個人から収集された雇用関連の個人情報には適用されません）。本セクションは、APPIの関連する通知要件に対処することを目的としており、上記の法律で定義された意味を持つ用語を使用します。

10.1 データの通知および開示の範囲

APPIの第15条および第16条に従い、第3条に記載されている目的のため、Eltは処理目的と厳密に関連したユーザーの情報を、以下のカテゴリーの団体に開示することができます。

- それぞれの職務や、ユーザーとの商業的関係に関連する契約上の義務の範囲内におけるEltの協力者、従業員、サプライヤー。
- Eltが提供するサービスの遂行および製品に関連する活動に従事するサプライヤーおよび下請け業者/子会社。
- 日本国外で個人情報を処理する「Elettronica Group」に属する他の企業。Eltは、個人情報の処理に関与する第三者がAPPI第16条の要件を満たしていることを保証します。

10.2 日本国外への個人情報の移転

Eltは、個人情報保護法（APPI）および一般データ保護規則（GDPR）に従い、Eltはユーザーの個人情報を日本国外の欧州連合（EU）/欧州経済領域（EEA）またはその他の第三国にある組織に移転する場合があります。

Elt は、適切な保護措置を実施することで、移転されても適用されるデータ保護法が遵守されることを保証します。特に、Elt は以下を遵守します。

- 日本の個人情報保護委員会（PPC）または欧州委員会（GDPR 第 45 条）による妥当性判断
- 欧州委員会が承認した標準契約条項（SCC）（GDPR 第 46 条）
- APPI 第 24 条に基づいて要求されるその他の適切な保護措置。同等のレベルでデータ保護を保証する契約上の合意を含む

10.3 ユーザーの権利

適用される法律上の例外を除き、以下の説明の通り、お客様は、弊社によるお客様の個人情報の使用および開示に関して、一定の選択肢を有しています。

- APPI 第 25 条に基づき、お客様は、弊社が収集した個人情報、および当該情報の収集、使用、開示に関する詳細の開示を求める権利を有します。
- さらに、APPI 第 26 条に基づき、一定の例外を除き、お客様は弊社が収集した個人情報の更新、訂正、削除を要求する権利を有します。
- クッキーのセクション（該当する場合）の記載の通り、お客様はクッキーの有効化を管理する権利を有します。
- また、日本の個人情報保護委員会に苦情を申し立てる権利も有しています。詳細につきましては、[<https://www.ppc.go.jp/en/contactus/>]をご覧ください。

上記の権利を行使するには、上記のアドレス (privacy.e4lifecorporate@e4life.it) に直接ご連絡ください。権利を行使する場合、当社は、本人確認ため、特定の情報（氏名、電子メールアドレス、電話番号、住所など）の情報提供を依頼する場合があります。

11. 変更および更新

本通知は、APP に掲載された日から有効となります。今後の法改正や追加に伴い、Elt が本規約に変更や追加を行う場合があります。本通知の最新版は、アプリの専用セクションでいつでもご覧いただけます。

ELETRONICA S.p.A