

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](#)

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](#)

المذكرة الإعلامية الخاصة بتطبيق E4Life

[المذكرة الإعلامية الخاصة بتطبيق E4Life MALLN الخاصة إلى معالجة البيانات الشخصية للمستخدمين 7-8 الذين](#)

[يقومون بتحميل ودخول واستخدام التطبيق في أفأرا . في الجمهورية الإيطالية](#)

[المذكرة الإعلامية الخاصة بتطبيق E4Life MALLN الخاصة إلى معالجة البيانات الشخصية للمستخدمين 7-8 الذين](#)

[يقومون بتحميل ودخول واستخدام التطبيق في أفأرا . في الإمارات العربية المتحدة](#)

[المذكرة الإعلامية الخاصة بتطبيق E4Life MALLN الخاصة إلى معالجة البيانات الشخصية للمستخدمين 7-8 الذين](#)

[يقومون بتحميل ودخول واستخدام التطبيق في أفأرا . في المملكة العربية السعودية](#)

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](#)

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

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

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 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

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



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

adequate security measures suitable for ensuring confidentiality and security.

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>].

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

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



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

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 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.

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>].

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



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:

- 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.

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

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

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.



1. صاحب معالجة البيانات الشخصية

2. معالجة البيانات الشخصية المجموعة

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

يوفر المستخدم بياناته الشخصية f_C مرحلة التسجيل. u منع المستخدم من التسجيل f_C حال عدم توفر $n7$ البيانات.

3. الأغراض من المعالجة

١٠٠ طلب من المستخدم تزويد بـ ACE بياناته الشخصية للأغراض التالية وصفها:

١. تمكّن 7-8 المستخدمين من تسجيل التطبيق.
٢. تحدثت إلى النماذج الثابتة للجهاز.
٣. إرسال معلومات بشأن تشغيل الجهاز وتحديثه وبشأن وظائفه وأوضاع خدمات جديدة ذات الصلة به (عن طريق البريد الإلكتروني أو إشعارات الدفع أو السماح للمستخدم بتلقيها).
٤. مراقبة البيانات الخاصة باستخدام التطبيق وتحليلها.

4. الأساس U^S R T^S Q_p للمعالجة

تخضع معالجة البيانات الشخصية للمستخدم من قِبل صاحب المعالجة للروط التام وصفها:

١٠. للأغراض المشار إليها في الفقرات (أ) و(ب) و(ج) من المادة (3) المنقولة أعلاه، نعتبر هذا الأمر "مؤثراً" لدخول التطبيق وللمتعمق الخدمة. النماذج الثلاث بواسطة التطبيق نفسه (الحرف [ب] من الفقرة [1] من المادة [6] من لائحة GDPR).
١١. للأغراض المشار إليها في الفقرة (د) من المادة (3) المنقولة أعلاه، لن نحقق صاحب المعالجة مصلحة الـ (الحرف [و] من المادة [6] من لائحة GDPR).

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، فإن نسبة إجراءات تنظيمية وفنية مناسبة لحماية البيانات الشخصية التي تخضع لهذه الإجراءات إلى منع فقدان وتدمير البيانات الشخصية و90% منع دخول و"تعدد" البيانات نفسها دون ترخيص.

6. نطاق توصيل البيانات و[TS

- لتحقيق الأغراض المنصوص عليها في المادة (3) يجوز للـ/كـ/Elc تزويد الأطراف التالية وصفها بـACEات المستخدم 7: 8 ذات الصلة الوثيقة N الأغراض من المعالجة المشار إليها أعلاه:
 - متعاو: A^٢ كـ/Elc وموظفيها ومزوديها، في إطار الوظائف المسندة إليهم وأولئك الذين اتفقوا على التعاقد المحتملة معهم ذات الصلة N العلاقات التجارية مع المستخدم 7: 8.
 - الـ/كـ/ACEات المؤردة وأولئك المؤردين من اللابن وأولئك المقاولين من اللابن العاملة على "نشاطات مرتبطة بـACEات الخدمات والمنتجات المتاحة من قبل كـ/Elc.
 - الـ/كـ/ACEات 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 للـ/كـ/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. A^٢ أو إلى أطراف قائمة خارج المنطقة الاقتصادية الأوروبية (المعروفة بـEEA).
- 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 كـ/Elc الضمانات الخاصة بحماية البيانات الشخصية المنصوص عليها في المادة 46 وما يليها من لائحة GDPR إن كانت تنطبق، أما في ذلك على ACEال المثال لا الحز البنود التعاقدية الاعترافية. أما في أحوال أخرى فـ/كـ/Elc يجوز تحليل البيانات الشخصية على أساس قرار كفاءة بناء على المادة 45 من لائحة GDPR. يُسمح للمستخدم بالحصول على نسخة من الضمانات المنفذة من قبل كـ/Elc والـ/كـ/Elc صادقت عليها السلطات المختصة من خلال إرسال طلب خاص إلى الأمر إلى عنوان الـ/كـ/Elc. privacy@e4.life.

8. سياسة الاحتفاظ بالبيانات

- تحتفظ كـ/Elc بالبيانات الشخصية للفرد n اللازمة للوفاء للأغراض التي تخضع لها في ظل متطلبات جمع البيانات نفسها بناء على هذه المذكرة الإعلامية.
- من 7: 8 الأمور المفيدة لتحديد الفئات المناسبة للاحتفاظ بالبيانات الشخصية للمستخدم 7: 8، تركزت كـ/Elc على شئيل خاص على أمانة البيانات الشخصية وطبيعتها وحساسيتها وسلب جمعها.
- على ACEال المثال:
- يتم الاحتفاظ بالبيانات الشخصية المجموعة للأغراض المشار إليها في الفقرات (أ) و(ب) و(ج) من المادة (3) المنقولة أعلاه في حذف الحساب الشخصي، ويمكن حذف الحساب من خلال إلغاء تقييد التطبيق أو

عن طريق طلب كتاب مرسل إلى عنوان الـ `privacy@e4.life` ، ما لم توجد أساليب أخرى
تتطلب الاحتفاظ بالبيانات لفترة أطول.

- تعد البيانات الشخصية المجموعة للأغراض المشار إليها f_C الفقرة (د) من المادة (3) المنقولة أعلاه مرتبطة برقم التسلسل للجهاز، ويتم الاحتفاظ بها بشكل دائم $N \neq 0$ بعد حذف بيانات الحساب الشخص C وذلك N موجب انتهاء الصلة $7-8$ المستخدم والجهاز واستحالة ربط البيانات نفسها N المستخدم.

9. حقوق المستخدم r p q

٨. يجوز للمستخدم أن يمارس f_C أي وقت الحقوق المنصوص عليها f_C المواد ما 7 8 (15-22) من لائحة GDPR، وعلى وجه التحديد الحقوق التالية: دخول بياناتهم الشخصية، وطلب تصحيح و/أو حذف البيانات الخاصة بهم f_C يتم صياغتها الاحتفاظ بها، والاعراض f_C معالجة بياناتهم، وطلب نسخة من المعلومات الخاصة بهم f_C يتم صياغتها الاحتفاظ بها، والاعراض f_C موافقة على معالجة بياناتهم (طالما تعتمد هذه المعالجة على الموافقة)، والحصول على الحد من معالجتنا لبياناتهم، وطلب تحايل البيانات الشخصية الموفرة إلى أنفسهم أو إلى أطراف ثالثة بواسطة ملفات قادمة للقراءة على حاسوب، وطلب تحايل البيانات.

تعتبر n بعض هذه الحقوق n مطلقة، فلا يتم تلطيغها دائماً a وقد تكون هناك بعض الاستثناءات. f_c إطار الإجابة علماً
 طلب صادر عن المستخدم، قد تطلب β كة Elt من المستخدم نفسه تأييد هـ آيته وتوف n معلومات مفيدة لتمك 7 8
 β كة Elt من فهم الطلب وشكل أفضل.

أما حق المستخدم أخص الف تقديم شكوى إلى هيئة الرقابة (الهيئة الإيطالية لحماية البيانات الشخصية)، ومقرها القانون f روما عنوان N 00187 - CAP 11 - Piazza Venezia، وعنوانها لـ in. الـ f protocollo@gpdp.it.

٨ يجوز للمستخدم أن يمارس الحقوق المذكورة أعلاه، وأن يعدل بيانات التواصل، وأن يشعر بـ "Elt" أي تحديثات محتملة للبيانات الشخصية، وأن يطلب حذف الحساب الشخصي، وأن يحصل على المزيد من المعلومات حول استخدام بياناته الشخصية من قبل بـ "Elt"، وأمل ذلك من خلال الاتصال بـ "Elt" نفسها. عنوان البريد الإلكتروني: privacy@e4.life.

10. التعديلات والتحديثات

١٥. التعديلات والتحديثات

نضع هذه المذكرة الإعلامية سارئة المفعول ابتداءً من تاريخ „ لها على التطبيق. قد تنفذ Elt تعديلات و Δ أو تقيّمات على التطبيق نفسه وذلك أيضاً نتيجة أي تعديلات و Δ أو تقيّمات A معينة محتملة قد تحدث لاحقاً. يمكن الاطلاع على الصيغة الأخيرة من مذكرتنا الإعلامية f أي وقت على الصفحة المخصصة الموجودة في التطبيق.

ELETTRONICA S.p.A. سكة S



1. صاحب معالجة البيانات الشخصية

2. معالجة البيانات الشخصية المجموعة

لا تتم معالجة البيانات المذكورة أعلاه إلا بالقدر اللازم لتحقيق الأغراض الموضحة f_c المادة (3) من هذه المذكرة الإعلامية.

يوفر المستخدم بياناته الشخصية f_c مرحلة التسجيل. u منع المستخدم من التسجيل f_c حال عدم توفر $n7$ البيانات.

3. الأغراض من المعالجة

١٠٠ طلب من المستخدم تزويد ACE بياناته الشخصية للأغراض التالية وصفها:

- ا. تمكّن 807 المستخدم من التسجيل N التطبيق.
 ب. تحدث الـ nامج الثامن للجهاز.
 ج. إرسال معلومات بشأن تشغيل الجهاز وتحديثه وبشأن وظائفه وأوضاع خدمات جديدة ذات الصلة به (عن طريق الـ nالإنترنت أو إشعارات الدفع لو سمح المستخدم بتلقيها).
 د. مراقبة البيانات الخاصة باستخدام التطبيق وتحللها، لغرض حل الأخطاء وأوضاع 807 الخدمة وتطوئرها لصالح تجربة المستخدم.

4. الأساس $U^S R T^S Q_p$ للمعالجة

تخضع معالجة البيانات الشخصية للمستخدم من قِبل صاحب المعالجة لا لسلطات التفتيش وصفاها:
للأغراض المشار إليها: الفقرات (أ) و(ب) و(ج) و(د) من المادة (3) المنقولة أعلاه، واعتبار هذا الأمر
مؤثراً. للدخول التطبيق وللمتعة الخدمة تحدث الـ n. الثالث بواسطة التطبيق نفسه (الفقرة [9] من
المادة [4] من المرسوم).

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، تبني الفاعلية إجراءات تنظيمية وفنية مناسبة لحماية البيانات الشخصية التي يجوزها، وتهدف هذه الإجراءات إلى منع فقدان وتدمير البيانات الشخصية و90% منع دخول و، وتعدّل البيانات نفسها دون ترخيص.

6. نطاق توصيل البيانات و [TS

- لتحقيق الأغراض المنصوص عليها في المادة (3) يجوز للفاعل تزويد الأطراف الثالثة وصفها بـ ACEات المستخدم 7: 8 ذات الصلة الوثيقة الأغراض من المعالجة المشار إليها أعلاه:
 - متعاو الفاعلية وموظفيها وموردتها، في إطار الوظائف المسندة إليهم وأو الإلهامات التعاقدية المحتملة معهم ذات الصلة بالعلاقات التجارية مع المستخدم 7: 8.
 - الإلهامات الموردة وأو المورد من اللاطن وأو المقابلة من اللاطن العاملة على، نشاطات مرتبطة بـ ACEات الخدمات والمنتجات المتاحة من قبال الفاعلية.
 - الإلهامات الأخرى التابعة لمجموعة Electronica Group في الإمارات العربية المتحدة و90% طالبها والخارج، سواء أغانيت وطنية أو دولية، بناء على المنهجيات المشار إليها في المادة (7) المنقولة أدناه.
- لا يجوز للفاعل 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.
- على 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 الفاعلية الضمانات الخاصة بحماية البيانات الشخصية المنصوص عليها في المادة 23 من المرسوم إن أمانت تنطبق، بما في ذلك على سـ ACE المثل لا الحز البنود التعاقدية الاعترافية. أما في أحوال أخرى فـ ACEت تحاليل البيانات الشخصية على أساس قرار كفاءة بناء المادة 22 من المرسوم. يُسمح للمستخدم للحصول على نسخة من الضمانات المنفذة من قبال الفاعلية والفاعل صادقت عليها السلطات المختصة من خلال إرسال طلب خاص بالأمر إلى عنوان الـ in.ال إلى privacy@e4.life.

8. في الاحتفاظ بالبيانات

- تحتفظ الفاعلية بالبيانات الشخصية للفاعلية اللازمة للوفاء للأغراض التي يجوزها نفسها بناء على هذه المذكرة الإعلامية.
- من بـ 7: 8 الأمور المفيدة لتحديد الفاعلية، سبب للاحتفاظ بالبيانات الشخصية للمستخدم 7: 8، تركزت الفاعلية على حذف الحساب الشخصي، ويمكن حذف الحساب من خلال إلغاء تطبيقات التطبيق أو خاص على أمانة البيانات الشخصية وطبيعتها وحساسيتها وسلاب جمعها.
- على 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 الشخصي، ويمكن حذف الحساب من خلال إلغاء تطبيقات التطبيق أو عن طريق طلب كتابي مرسى إلى عنوان الـ in.ال إلى privacy@e4.life، ما لم توجد أساليب أخرى.
- تتطلب الاحتفاظ بالبيانات لفـ 90 أطول.

٨. يجوز للمستخدم أن يمارس f.c أي وقت الحقوق المنصوص عليها f.c المرسوم، وعلى وجه التحديد الحقوق التالية:

٩. دخول البيانات الشخصية، وطلب تصحيحها أو حذف البيانات الخاصة بـ N.M إلى f.c يتم صياغتها الاحتفاظ بها، والاعراض على معالجة البيانات، وطلب نسخة من المعلومات الخاصة بـ N.M إلى f.c يتم صياغتها الاحتفاظ بها، والراجع عن الموافقة على معالجة البيانات (طالما تعتمد هذه المعالجة على الموافقة)، والحصول على الحد من معالجة البيانات، وطلب تحذيل البيانات الشخصية الموفرة إلى أنفسهم أو إلى أطراف ثالثة بواسطة ملفات قابلة للقراءة على حاسوب، وطلب تحذيل البيانات.

تتبع n بعض هذه الحقوق $n7$ مطلقة، فلا يتم تلطيحها دائم α وقد تكون هناك N بعض الاستثناءات. f_c إطار الإجابة α علماً
 طلب صادر عن المستخدم، قد تطلب β كة Elt من المستخدم نفسه تأ A^{α} هـ آتته وتوف $n7$ معلومات مفيدة لتمك 7 8٠
 β كة Elt من فهم الطلب α شقل أفضل.

٨ يجوز للمستخدم أن يمارس الحقوق المذكورة أعلاه، وأن يعدل كفاءات التواصل، وأن يشعر بـ "Elt N أي تحديثات محتملة للبيانات الشخصية"، وأن يطلب حذف الحساب الشخصي، وأن يحصل على المزيد من المعلومات حول استخدام بياناته الشخصية من قِبل "Elt B". وأمل ذلك من خلال الاتصال بـ "Elt B" نفسها عن عنوان الـ n.in.

٩ privacy@e4.life

علّا نحو مختلف، لحماية حقوقه، يجوز للمستخدم التواصل مع (مفوض حماية البيانات) f_C سوق أبوظ. f_C العال %)
f_C أبوظ. f_C ا عنوان ال. ind الإلّ وn آ dpo@adgm.com أو مع (مفوض حماية البيانات) f_C د. آ n. عنوان ال. ind
الإلّ وn آ commissioner@dp.difc.ae.

n. هذه المذكرة الإعلامية سارئة المفعول ابتداءً من تاريخ „ لها على التطبيق. قد تنفذ Elt تعدلات و أو تطبيقات على التطبيق نفسه وذلك أضاً نة أية تعدلات و أو تطبيقات أ اعة محتملة قد تحدث لاحقاً. يمكن الاطلاع على الصيغة الأخن7n من مذكرتنا الإعلامية f أى وقت على الصفحة المخصصة الموجودة f التطبيق.

40



1. صاحب معالجة البيانات الشخصية

2. معالجة البيانات الشخصية المجموعة

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

3. الأغراض من المعالجة

٥٠ طلب من المستخدم تزويد EIt بـ ACE بياناته الشخصية للأغراض التالية وصفها:

- ا. تمكّن 780 المستخدم من التسجيل N التطبيق.
 ب. تحدث النماذج الثابتة للجهاز.
 ج. إرسال معلومات بشأن تشغيل الجهاز وتحديثه وبنشأن وظائفه وأدوات خدمات جديدة ذات الصلة به (عن طريق البريد الإلكتروني أو إشعارات الدفع لو سمح المستخدم بتلقيها).
 د. مراقبة البيانات الخاصة باستخدام التطبيق وتحليلها، لغرض حل الأخطاء وأدوات تحسين 780 الخدمة وتطوئرها لصالح تجربة المستخدم.

4. الأساس U^S R T Q_p للمعالجة

تخضع معالجة البيانات الشخصية للمستخدم من قِبل صاحب المعالجة للروط التالفة وصفها:
لأغراض المشار إليها f_C الفقرات (أ) و(ب) و(ج) و(د) من المادة (3) المنقولة أعلاه، لناعتار هذا الأمر
تأثيراً. لدخول التطبيق وللمتعة Nخدمة تحدت ال. nنامج التالت بواسطة التطبيق نفسه (الفقرة [2] من
المادة [6] من نظام PDPL).

5. كفاءة المعالجة

تتم معالجة البيانات الشخصية للمستخدم بواسطة أجهزة معلوماتية وتتم حمايتها من خلال تبني f_C الإجراءات الأمنية
اللازمة المناسبة لضمان خصوصيتها وسلامتها.
على وجه التحديد، تبني f_C إجراءات تنظيمية وفنية مناسبة لحماية البيانات الشخصية الـ f_C Nحوزتها، وتهدف هذه
الإجراءات إلى منع فقدان وتدمير البيانات الشخصية و%90 منع دخول و، f_C وتعديل البيانات نفسها دون ترخيص.

6. نطاق توصيل البيانات و [تأثيرها]

- لتحقيق الأغراض المنصوص عليها f_C المادة (3) يجوز لـ f_C تزويد الأطراف التالفة وصفها بـ ACEات المستخدم 7 8
ذات الصلة الوثيقة Nالأغراض من المعالجة المشار إليها أعلاه:
- متعاو f_C f_C موظفيها وموردتها، f_C إطار الوظائف المسندة إليهم وقأو الـ nات التعاقدية المحتملة
معهم ذات الصلة Nالعلاقات التجارية مع المستخدم 7 8 .
- الـ f_C الموارد وقأو المورد من اللاطن وقأو المقاول من اللاطن العاملة على، نشاطات مرتبطة بـ f_C الخدمات
والمنتجات المتاحة من قِبل f_C.
- الـ f_C الأخرى التابعة لمجموعة Electronica Group f_C المملكة العربية السعودية و%80 طالها والخارج، سواء
أجنبية وطنية أو دولية، بناء على المنهجيات المشار إليها f_C المادة (7) المنقولة أدناه.
- لا يجوز، f_C البيانات الشخصية للمستخدم إلى أطراف غـ n7 محددة تختلف عن الأطراف المذكورة أعلاه.

7. معالجة البيانات الشخصية خارج المملكة العربية السعودية

لتحقيق الأغراض المنصوص عليها f_C هذه المذكرة الإعلامية، يجوز تحاليل البيانات الشخصية خارج الأرا d الوطنية
إلى بلدان قائمة ضمن الاتحاد الأوروبي. f_C أو إلى أطراف قائمة خارج المملكة العربية السعودية.
على أي حال، يتم تحاليل البيانات الشخصية للمستخدم إلى بلدان قائمة خارج المملكة العربية السعودية بناء على
القوان 7 8 المعمول بها مع عدم الإضرار بحقوق المستخدم المنصوص عليها f_C القانون.

أستخدم f_C الضمانات الخاصة بحماية البيانات الشخصية المنصوص عليها f_C المادة (5) وما يليها من لائحة
نقل البيانات إن كانت تنطبق، بما f_C ذلك على ACE المثل لا الحز البنود التعاقدية الاعترافية. أما f_C أحوال أخرى
فأجوز تحاليل البيانات الشخصية على أساس قرار كفاءة بناء المادة (3) من لائحة نقل البيانات. يُسمح للمستخدم
Nالحصول على نسخة من الضمانات المنفذة من قِبل f_C f_C صادقت عليها السلطات المختصة من خلال
إرسال طلب خاص Nالأمر إلى عنوان الـ n. d إلى f_C و n. d إلى f_C privacy@e4.life.

8. فـ m الاحتفاظ بالبيانات

تحتفظ f_C Nالبيانات الشخصية للفـ n اللازمة للوفاء Nالأغراض الـ f_C قد تطلبت جمع البيانات نفسها بناء على هذه
المذكرة الإعلامية.

من 7 8 الأمور المفيدة لتحديد الفـ n السبب للاحتفاظ Nالبيانات الشخصية للمستخدم 7 8، تركزت f_C Nالبيانات
خاصة على أهمية البيانات الشخصية وطبيعتها وحساسيتها وسلب جمعها.
على ACE المثل:

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

Veillez 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'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