

PRIVACY POLICY - JOINON EVO - APP STORE

Dear User,

with this document, Gewiss S.p.A. intends to provide you, as the interested party, with information on the overall processing of your Personal Data carried out following the use of the App that you are about to download onto your device.

This information notice is not intended as a substitute for further specific information on the processing of your Personal Data that Gewiss will provide you with, taking into account the different stages of the processing.

These disclosures will be submitted to you, depending on the individual phase, at the time the personal data is collected and, on these occasions, you will also be asked to provide any specific consent that is necessary to fulfil the purposes set out in point 4, letters d), e) and f) below.

This document is prepared in accordance with Article 13 of the European Regulation No. 2016/679 on the protection of individuals with regard to the processing of Personal Data (hereinafter "GDPR").

1. Personal Data Controller

The Data Controller is Gewiss S.p.A. (the "Controller" or "Gewiss"), tax code and VAT number 00385040167, with registered office in Via A. Volta, 1 - 24069 Cenate Sotto (BG) - Italy, e-mail address: privacy@gewiss.com.

2. Contact details of the Gewiss Data Protection Officer (DPO)

The Data Controller has appointed a Data Protection Officer ("DPO"), pursuant to Articles 37 - 39 GDPR. In case of need, the DPO can be contacted at the following e-mail address: dpo@pec.gewiss.com.

3. Phases and personal data subject to processing

The processing of your Personal Data is divided into the following phases:

- a) **Registration and creation of your personal profile** (in this phase you will be presented with the Gewiss registered user information)

In this first phase, you will be asked to register on the Gewiss platform (hereinafter the "Platform"), creating your personal profile. This platform is used by Gewiss for the management of all accounts relating to the use of its apps. Therefore, the profile created will not be bound only to the use of the App that you are about to download, but may also be used by you in the future to take advantage of further Apps provided by the Owner.

Gewiss has created an Identity Management system that allows registered users to access all Gewiss sites/services/apps (hereinafter, "Services"), regardless of the device used, by entering their authentication credentials. Therefore, after registering for one of the aforesaid Services, users will be able to access one of the others (subject to acceptance of the relative contractual conditions and specific supplementary information on the processing of personal data), using their own credentials (e-mail address and password) without therefore having to register again.

The data to be processed at this stage may concern:

a.1 Registration via the collection form. This refers to the Personal Data you provide by filling in the appropriate form, for the purpose of registering a nominal user on the Platform (such as, for example, name, surname, e-mail, date of birth and address).

a.2 Registration via Social Login. You may also log in to the Platform using credentials provided by social networks such as Facebook, Google and Apple (so-called "social login"). This is a useful and quick method for creating accounts aimed at accessing our Apps on different platforms. In this regard, Gewiss would like to inform you of what information is acquired and processed by it when interacting with these social platforms.

First of all, the information associated with your social account will only be transmitted to Gewiss following your express and specific consent and will concern only the following data:

- Apple: name and e-mail address;
- Facebook: name, profile picture and e-mail address;
- Google: any personal information made public, as well as your e-mail address.

N.B. Please note that Gewiss will take care of deleting any additional and irrelevant data obtained through the Social Login procedure.

In any case, following authentication via the social platform, Gewiss may ask you to provide further information, if this is essential to finalise your registration with the Platform. The data subject to tr

- b) Installation and access to the JOINON EVO App (at this stage, you will be provided with the information on the processing of Personal Data by means of the JOINON EVO App).

Following your access to the JOINON EVO App, the latter shall have access to your personal profile (as described in point a) to which, consequently, any activity performed or information collected through the same App shall be linked.

- c) Use of the JOINON EVO App .

c.1 Information collected by the App

Using the App, you will be able to control, monitor and parameterise the JOINON I-CON or I-ON series charging station (hereinafter referred to as 'charging station'), connected to the cloud via the home Wi-Fi network provided at the charging station. When using the App, the following information will be collected:

- the IP address or ID of your device;
- the model, make of your device managed through the App;
- the addresses in URI (Uniform Resource Identifier) notation of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the IT environment of your device;

- information relating to the states and changes of state of the charging station(s);
- electrical measurement data (e.g. energy, power) and related graphs summarising trends over time;
- data relating to the parameterisation of the executed functions set via the app on the charging station, such as electrical variables linked to the operation of the charging station, operating modes or time settings;
- information on the interactions you have made with the App, including commands for the activation and deactivation of charging sessions;
- e-mail addresses or telephone numbers used for sending notifications following events;
- geolocation of your device, i.e. mobile sensor data generated by the movement or orientation of your device.

c.2 Authorisations required by the App

- Photos/media elements/files
 - o Reading the contents of your USB storage to allow you to customise the background of the areas in the JOINON EVO app;
 - o Editing/deleting the contents of your USB storage, only after your request to do so.
- Storage space
 - o Reading, editing and deleting the contents of its USB storage to check if there is enough space to write diagnostic logs.
- Wi-Fi connection information
 - o See active Wi-Fi networks in the area to allow connection to available networks.
- Other
 - o Receive data from the Internet to be able to perform downloads required for app operation;
 - o See network connections and full network access to determine the network to which to connect the charging station.

4. Purposes and legal basis for processing

The Controller shall process your Personal Data for the achievement of specific purposes and in the presence of a specific legal basis provided for by the GDPR.

In particular, the purposes for which your Personal Data are processed by Gewiss and the legal basis of the relevant processing are listed below:

- a) Purpose of processing: Enabling users to register on the Platform in order to be able to use the Services.
Legal basis for processing: performance of a contract to which the data subject is a party.
- b) Purpose of the processing: Access to the App and its use by the user;
Legal basis for processing: performance of a contract to which the data subject is party.
- c) Purpose of processing: Communications with the user (for example, if you contact Gewiss by e-mail or otherwise, the latter may use the Personal Data to answer questions or solve problems);
Legal basis of the processing: performance of a contract to which the data subject is party.

- d) Purposes of the processing: Direct marketing purposes. By way of example: sending - by automated contact methods (such as sms, mms and e-mail) and traditional methods (such as telephone calls with operator and traditional mail) - promotional and commercial communications relating to services/products offered by Gewiss or notification of company events, carrying out market studies and statistical analyses; as well as sending questionnaires to users for the purpose of detecting the degree of customer satisfaction regarding the quality of services rendered;
Legal basis for processing: consent (optional and revocable at any time).
- e) Purposes of the processing: Profiling purposes. Specifically, analysis of your preferences, habits, behaviour or interests in order to send you personalised commercial communications;
Legal basis of the processing: consent (optional and revocable at any time).
- f) Purposes of the processing: Purpose of communication/transfer of your Personal Data to third parties for the commercial and marketing purposes of said third parties;
Legal basis of the processing: consent (optional and revocable at any time).
- g) Purposes of the processing: possible need to ascertain, exercise, defend the Controller's rights in court.
Legal basis of the processing: legitimate interest.
- h) Purpose of the processing: fulfilment of obligations provided for by regulations and applicable national and supranational legislation;
Legal basis of the processing: need to fulfil legal obligations.

5. Retention Period

With reference to the retention period of Personal Data we specify the following:

- Retention period of the data relating to points 4 a), b), c), and h): contractual duration and, after termination, 10 years.
- Period of data retention relating to point 4 d): 24 months from registration and in any case until revocation of consent.
- Period of data retention relating to point 4 e): 12 months from the provision of profiling data and in any case until revocation of consent.
- Period of data retention relating to point 4 f): until revocation of consent.
- Period of conservation of the data relating to point 4 g): in the event of legal disputes, for the entire duration of the same, until the time limit for appeals is exhausted.

Once the aforementioned retention periods have expired, the Personal Data will be destroyed, deleted or rendered anonymous.

6. Obligatory nature of providing Personal Data

With regard to the Platform registration form, the provision of data marked with an asterisk (*) is mandatory for the conclusion and continuation of the contract. Therefore, refusal will not allow registration to the Platform and, consequently, to the Site/Service/App.

The provision of your Personal Data is also necessary in all cases in which the processing is carried out on the basis of a legal obligation or to perform a contract to which you are a party. Your refusal may make it impossible for Gewiss to carry out the purpose for which the Personal Data is collected. Consent to the processing of Personal Data for the purposes set out in point 4, letters d), e) and f) is free, optional and revocable at any time. Withdrawal of consent shall not affect the lawfulness of processing based on the consent before withdrawal.

7. Recipients of Personal Data

Personal Data within the scope of the above purposes may be communicated to one or more of the categories of entities appointed as Data Processors better specified below, such as for example

- professional firms
- external companies offering e-mailing services
- external companies offering hosting services or tasks of a technical nature;
- external companies offering support in carrying out market studies;
- external telecommunications companies;
- Gewiss Group companies.

Personal Data may be communicated to external parties operating as autonomous Data Controllers, by way of example, authorities and supervisory and control bodies, other Gewiss Group Companies and, in general, subjects, public or private, with the right to request personal data.

8. Transfer of data outside the European Economic Area (EEA)

Personal Data will be processed within the EEA. If for technical and/or operational reasons it is necessary to use subjects located outside the EEA, the processing will be regulated in compliance with the GDPR and all necessary precautions will be taken to ensure the protection of personal data, pursuant to Article 46 of the GDPR.

9. Persons authorised to process data

Personal Data may be processed by the employees of the company functions assigned to the pursuit of the purposes indicated above, who have been expressly authorised to process the data and who have received adequate operating instructions.

10. Rights of the Data Subject

The Data Subject, in relation to the Personal Data provided, is entitled to exercise at any time and in accordance with the provisions of the GDPR the rights established by the latter and set out below:

- Right to withdraw consent (art. 7(3) GDPR): right to withdraw the consent given without affecting the lawfulness of the processing based on the consent before the withdrawal;

- Data subject's right of access (Art. 15 GDPR): right to obtain confirmation of the existence or non-existence of one's personal data and a copy thereof in an intelligible form;
- Right of rectification (Art. 16 GDPR): the right to rectification of one's own inaccurate personal data;
- Right to erasure "right to be forgotten" (art. 17 GDPR): right to erasure of one's own personal data;
- Right to restriction of processing (Art. 18 GDPR): right to obtain the restriction of processing, of one's own personal data, e.g. in case the accuracy of the data is contested or in case of unlawful processing;
- Right to data portability (Art. 20 GDPR): the right to receive in a structured, commonly used and machine-readable format one's own personal data provided to the Controller and the right to transmit such data to another Controller if the processing is carried out on the basis of consent or a contract and is carried out by automated means;
- Right to object (Art. 21 GDPR): right to object to the processing of one's personal data;
- Right not to be subject to automated decision-making (Art. 22 GDPR): right not to be subject to a decision based solely on automated processing.

These rights may be exercised by sending a written communication to the Data Controller at the following e-mail address: privacy@gewiss.com.

The data subject also has the right to lodge a complaint with the competent Data Protection Authority.

11. Changes to the Privacy Policy

Gewiss reserves the right to update or amend this Privacy Policy periodically and at any time. In this event, Gewiss shall provide you with a clearly visible notice that, depending on the circumstances, may, for example, be displayed within the App or transmitted by e-mail. You are therefore invited to read these notices carefully.