

Information on the processing of personal data

Dear User, this Information Notice is provided pursuant to and in accordance with Article 13 of Regulation (EU) 2016/679 (hereinafter referred to as 'GDPR') on the protection of individuals with regard to the processing of personal data in connection with the use of the software application 'FRNET' (hereinafter referred to as 'APP' for brevity).

1- Data Controller

The Data Controller of your personal data is Fracarro Radioindustrie s.r.l., with registered office in Castelfranco Veneto, Viale delle Querce 9. Any communications or requests may be sent to the e-mail address privacy@fracarro.com.

2- Purpose of processing, legal basis and categories of processed data

Your personal data will be processed for the following purposes:

- a. the download and activation of the App;
- b. the creation and registration of your account;
- c. performance of the App's functionalities;
- d. checking the correct operation of the products connected to the App and reporting any faults;
- e. operating, managing and troubleshooting the App;
- f. to process statistical information on the use and proper functioning of the App.
- g. upon your request to Fracarro Radioindustrie s.r.l., allow third parties with whom you have entered into cooperation agreements to access the information you have entered into the APP
- h. to respond to your requests to exercise your rights under Regulation (EU) 2016/679.

In relation to the purposes under letters a),b),c),d),e) and g) the legal basis of the processing is the performance of contractual obligations incumbent on our company in relation to the provision and use of the App.

For the purposes set forth in letters f) and g) the legal basis is the legitimate interest of the Data Controller to process statistics on the use and proper functioning of the App.

In relation to the purpose indicated in letter h), the legal basis is the execution of the legal obligations incumbent on our company under the provisions of the GDPR.

In relation to the above-mentioned purposes, the Data Controller will process the following categories of data

- data for the creation of the user's access profile (such as name, surname, password, email, telephone, address, company name, VAT number)
- technical information on the products and devices associated with the user (such as the identification code, settings and operating data of the product connected to the App, brand, model, operating system of the device used to use the App)
- information relating to access and use of the App.
- any data and information that you autonomously decide to enter in the optional and free fields in the registration form.

3- Data retention period

With specific regard to the purposes described in points a),b),c),d),e) and f) your data will be processed for 24 months from the date of the last access to the services provided by the App. In case You have requested and activated the 'PRO' service of the App, Your data will be kept for the duration of the contract related to this service and thereafter for a further 24 months from the date of the last access after termination of the 'PRO' contract.

With regard to the purpose described at letter h) your personal data will be processed for the time necessary to handle your requests and subsequently for a period of time related to the obligation to document the activities carried out in relation thereto and to the five-year limitation period for administrative offences.

4- Provision of data and consequences of failure to provide data

The provision of data for the purposes indicated above, with the exception of f), is necessary for the provision of services connected to the App and to respond to your requests. The refusal to provide the data would therefore not allow the use of the App and the response to your requests.

The provision and use of data for the purposes referred to in point f) is optional and, in the event of your objection, the only consequence will be the impossibility for the Data Controller to use the data for static purposes.

5- Categories of recipients

Your data may be processed by:

- employees and collaborators of the Controller, in their capacity as authorised processors and/or system administrators;
- third party companies that perform outsourcing activities on behalf of the Controller in their capacity as data processors (in particular to: Google Ireland Limited for user authentication and for the storage of the data necessary for the operation of the APP; to Mr. Nicola Pigozzo for the maintenance of the APP).
- upon your specific request, to third parties with whom you have entered into collaboration agreements and to whom you wish to grant access to the information you have entered in the APP.

6- Transfer of data to a third country

Your personal data will mainly be processed in data centres located within the European Economic Area.

The use of the services of Google Ireland Limited may involve, in some cases, the transfer of data to the United States. This transfer will take place pursuant to the adequacy decision adopted by the European Commission on 10.7.2023 (so-called Data Privacy Framework).

7- Rights of data subjects

You have the right (pursuant to Articles 15-22 of Regulation 2016/679) to ask our company for access to your personal data and to rectify them if they are inaccurate, to delete, restrict or deny their processing if the conditions provided for by the legislation in force are met. If the necessary legal prerequisites are met, you also have the right to request the portability of your data. You also have the right, if you consider that your rights have been infringed, to lodge a complaint with the relevant supervisory authority, i.e. the Personal Data Protection Authority, or to take legal action.