
PRIVACY POLICY

In accordance with Article 13 of the Italian Legislative Decree of 30 June 2003, n. 196 "Code regarding the protection of personal data" (hereinafter also just the "Code") and article 13 of Regulation (EU) 2016/679, laying down provisions for the protection of individuals with regard to the processing of personal data and to the free circulation of such data (hereinafter also just the "GDPR"), We provide you, below, with the information regarding the processing of your personal data.

1. The owner of the processing of personal data

Your personal data will be processed, according to the purposes as better identified in paragraph 3 "Purpose of the processing of personal data" which follows, by the following subject as independent data controllers:

the Company Over SpA, in the person of its legal representative, with registered office in Roma (RM), Italy, Via Maffio Maffii, 11, Postal Code 00157, F.C 12065001005, VAT 12065001005.

2. Data protection officer

The Data Protection Officer (DPO) can be reached at the following address: Personal Data Protection officer, Via Maffio Maffii 15, Postal Code 00157, Roma, Italy, email: privacy@overttechnologies.com

3. Categories of personal data processed

Your personal data is collected to provide and constantly improve our products and services. The following are the data categories we collect:

Data provided to us directly for access to our services. Some data may not be provided, but in this case, some services may not be accessible. These are the categories of data we collect:

- Registration information, including name, surname, date of birth, gender, email, any profile picture and online identification data such as username and password
- Information regarding the job position, such as company of belonging and position

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- Information on the monitored structures such as location, identification codes, square meters, number of employees

Additional contact information (to be offered optionally for access to features such as SMS notifications or dual-factor authentication) as a phone number

Data that is automatically collected: while using the OVER Services, we automatically receive and store certain categories of data. It is possible to decide not to provide some data, but in that case, some services may not be accessible.

These are the automatically collected data categories:

- Energy data relating to the structures monitored such as POD, nominal voltage, available power and consumption data (voltage, current, power factor and all electrical quantities derived from them)
- Data needed to guarantee operations at a given plant in safety, such as the Internet protocol (IP) address used to connect your computer or other devices to Internet and the critical activities performed, that is implementation and programming operations

3. Purpose of the processing of personal data

Your personal data will be processed, with your explicit prior consent, where necessary, relating only to the provision of services and features offered by Over SpA. These purposes include:

- **Access to the Overboard platform.** We use your data to allow you access to the Overboard platform, through which you can monitor and control all the facilities associated with your account
- **Access to the Cerbero platform.** We use your data to allow you access to the Cerbero platform through which you can manage backend functions useful for the programming and maintenance of one or more plants associated with it
- **Communications to the customer.** We use your personal data to communicate news that may be on the platforms you use (e.g. release new updates, release new products, events related to the OVER world etc)
- **Log activity carried out.** Some data will be collected automatically to guarantee the operation of critical plants (e.g. bank branches) in complete safety
- **Use of data for statistical purposes.** The data collected by the platform can be processed using mathematical and static methods in order to develop benchmarks for comparing homogeneous data. All data thus processed will always be made anonymous

4. Cookie

The use of cookies falls into the category of technical cookies. These cookies are used exclusively to allow our systems to recognize your browser or device. By using or interacting with the services offered, the interested party authorizes the use of this technology. The sending of technical cookies may be blocked or limited by the user by revoking the authorization using the options made available by the browser in use. If this occurs, the use of the services available to the customer is subject to significant functional limitations.

5. Legal basis for the processing of personal data

The legal basis of the processing for the purposes referred to in paragraph 3 is your specific Consent.

Unless otherwise specified, all required Data is mandatory. If the User refuses to communicate them, it may be impossible to use the Service. In cases where the Data are optional, the Users are free to refrain from communicating them, without this having any consequence on the availability of the Service or on its operation but only on access to specific improvement functions.

6. Methods of processing personal data

In relation to the purposes, the processing of the Data takes place through manual, computerized and telematic tools with logics strictly related to the same purposes and, in any case, in such a way as to guarantee the security and confidentiality of the data, as well as compliance with the specific obligations enshrined from law. The Data Controller adopts the appropriate physical, electronic and organizational security measures aimed at preventing unauthorized access, disclosure, modification or destruction of Personal Data.

7. Processing of extra-EU personal data

Your personal data and those of other parties will not be transferred outside the European Union.

8. Storage of personal data

Over SpA will keep your personal data for the time necessary for the execution and management of the related services.

Consumption data will be stored after the termination of the service, but anonymously so as not to allow, even indirectly or by connecting other databases, to identify the interested parties.

9. Exercise of rights by the interested party

Each interested party has the right to ask the Data Controller, at any time, access to the Data concerning him, the correction, the cancellation of the same or to oppose their treatment; where applicable, the interested party also has the right to request the limitation of processing in the cases provided for by art. 18 of the Regulation, to obtain in a structured format, commonly used and readable by automatic device, the data concerning him, in the cases provided for by art. 20 of the Regulation; as well as to make a complaint to the competent control authority pursuant to Article 77 of the GDPR (Guarantor for the protection of personal data) pursuant to art. 77 of the Regulation, if it considers that the processing of data is contrary to the legislation in force.

Your requests for the exercise of your rights must be addressed in writing to the Data Controller at the addresses indicated in paragraph 10 "Contacts for the exercise of the rights of the interested party and for further information" which follows.
The exercise of rights is not subject to any form restrictions and is free.

10. Contacts for the exercise of the rights of the data subject and for further information

For the exercise of your rights in relation to the purposes referred to in paragraph 3, to obtain any type of information that you may need, you can send a written communication to the headquarters of the Data Controller.

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