

Be Charge srl

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Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

Data subject: Prospect App.

Be Charge srl in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

Purposes and legal base of the processing: your data will be processed for the following purposes necessary to pursue the legitimate interest of the controller:

- Management of marketing services of the Be Charge S.r.l. App;
- Marketing Analytics by AppsFlyer.

For the purposes of the aforesaid processing, the Data Controller may obtain knowledge of special categories of data, as follows: Internet browsing log file, Technical identifiers and user preferences. Personal data in these special categories are processed in compliance with art. 9 of the GDPR.

Processing procedures. Your personal data may be processed by the following ways:

- contract data processing by third parties;
- Temporary data processing aimed to a quick data aggregation of data or its transformation according to anonymous procedures.

All data are processed in compliance with the procedures specified in articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required. For more information, please visit the "Security & Privacy" section of AppsFlyer, available at the following link <https://www.appsflyer.com/product/security-and-privacy/>.

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of Recipients, including all the duly designated Data Processors:

- AppsFlyer.

Distribution: Your personal data will not be distributed in any way.

Your personal data may also be transferred, only for the aforesaid purposes, to the following countries:

- China (Beijing);
- EU countries;
- Hong Kong;
- India;
- Japan;
- Safe extra EU countries.;
- Switzerland;
- The United Kingdom;
- United States.

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimisation of data, pursuant to art. 5 of the GDPR, the data storage period for your personal data is:

- In compliance with the terms prescribed by law for the type of activity and in any case until the revocation of consent or until the exercise of the right of opposition.

You can object to this data processing at any time by exercising your right to opt-out at the following link: <https://www.appsflyer.com/optout>.

Data Controller: the Data Controller, as defined by the Law, is Be Charge srl (Via Carlo Bo 11 , 20143 Milano (MI); VAT number: 09957510960; contactable at the following addresses: E-mail: simona.amante@becharge.it) in the person of Paolo Martini.

The Data Protection Officer (DPO) designated by the Data Controller pursuant to art. 37 of the GDPR is:

- Epta-Key S.r.l. nella persona dell'Avv. Giovanbattista Bernardo (Viale Luigi Majno n.5 , 20122 Milano (MI); VAT number: 08923570967; contactable at the following addresses: E-mail: dpo@bepower.com; Phone number: 0236576041).

You are entitled, by application to the Data Processor, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. For more information, please visit the AppsFlyer privacy policy available at the following link: <https://www.appsflyer.com/privacy-policy/>.

You may also examine whenever you like the updated version of the present report by connecting to the following web site <https://www.privacylab.it/informativa.php?19305436283&lang=en>.

Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

- a. the source of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied if the data are processed by electronic devices;
- d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
- e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
- d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.