

PRIVACY POLICY

SBS S.p.A., with registered office in Via Circonvallazione s/n, 28010 Miasino, Tax Code and VAT No. 01888310032 (hereinafter, the "**Company**" or the "Data **Controller**"), is strongly committed to protecting privacy and personal data. Therefore, we hereby intend to inform you about how we will process your personal data in accordance with the European Data Protection Regulation (the "**Regulation**" or "**GDPR**") in connection with your use of our "VIVANCO SMART" (hereinafter, the "**App**") and related smart home device management services (the "**Smart Home Devices**").

We inform you that we will process your data for the following purposes:

- a) Account creation,
- b) Management of Smart Home Devices,
- c) Customer service.

You can contact the Data Controller by sending an e-mail to info@sbsmobile.it

1. What types of personal data are processed?

Your personal data is processed for the purposes listed in the following paragraph.

In particular, we will process the following personal data:

- a) Creation of your account and access management;
 - Personal information (first name, surname);
 - account details (e-mail address), unique account identifier;
 - if applicable, location information (country, time zone);
 - language preference.
- b) Smart Home Device Management;
 - Wi-Fi information (SSID, BSSID, Wi-Fi Mac address, Wi-Fi password);
 - Smart Home Device information: device name, virtual device ID, device Mac address, online status, activation time, firmware version, device power (optional), voltage (optional), battery capacity (optional), power status;
 - Connection information: IP address.
- c) Analysis and statistics: technical logs, information about browsing activity.
- d) Customer support
 - Account data, information about Smart Home Devices: device name, virtual device ID, device MAC address, online status, activation time, firmware version, device power (optional), voltage (optional), battery capacity (optional), power status;
 - Connection information: IP address.
- e) Cloud image storage: if you activate the service and if the cameras you have purchased are compatible, the images recorded by the cameras will be stored in the cloud on a server within the European Union. If you do not activate the service, images recorded by the cameras will remain stored on the Smart Home Device or, if purchased, on the installed micro SD card.

2. How was my personal data obtained?

Personal data is collected in the following ways:

- account data (including the unique account ID) is provided directly by the user when creating the account;
- technical characteristics, such as Wi-Fi and Smart Home Device information, IP address, technical logs or browsing history, may be automatically detected/collected via the App.

3. For what purposes will my personal data be processed?

We will process your personal data for the following purposes:

Purpose	Legal basis	Retention period
Account creation	The need to perform a contract to which you are a party (Art. 6(1)(b) GDPR).	Data relating to your account will be retained for as long as your account remains active and will be deleted immediately after your account is closed. Your contractual data will be retained for as long as necessary to fulfil contractual obligations and legal requirements (e.g. 10 years for tax purposes).
Smart Home Device Management	The need to perform a contract to which you are a party (Art. 6(1)(b) GDPR). The Company's legitimate interest in keeping connected devices functional, secure and efficient (Art. 6(1)(f) GDPR).	Your personal data will be retained for the time necessary to fulfil contractual obligations and legal requirements (e.g., 10 years for tax purposes). If your data is processed on the basis of legitimate interests, it will be retained for as long as necessary to pursue that legitimate interest.
Cloud storage service	The need to perform a contract to which you are a party (Art. 6(1)(b) GDPR).	Depending on the option chosen, the images collected by the cameras will be stored for 14 or 30 days. After this period, the images will be permanently deleted.

Reports and statistics	The Company's legitimate interest in analysing trends, improving services or generating <i>business intelligence</i> activities (Art. 6(1)(f) GDPR).	Your data will be stored for as long as necessary to pursue this legitimate interest.
Marketing	<p>Your consent (Art. 6.1.a. of the GDPR).</p> <p>The Company will process your personal data to send you commercial communications and/or promotional material relating to the services offered by the Company and to involve you in market research and surveys. For example, we may send you emails or use instant messaging services (including WhatsApp) or contact you by telephone through an operator to illustrate commercial offers, initiatives and promotions relating to our services.</p> <p>Consent is not mandatory and if you decide not to give it, you will still be able to use the services requested.</p>	Your data will be stored until you withdraw your consent.
Profiling	<p>Your consent (Art. 6.1.a. of the GDPR).</p> <p>The Company may create a profile based on your personal information, preferences and interests, and your previous purchases (e.g. purchase history) in order to send you personalised promotional information and marketing material, targeted advertising and</p>	We will process your personal data for profiling purposes until you withdraw your consent. Data relating to previous purchases will be stored for 12 months.

	<p>tailor-made commercial offers.</p> <p>Consent is not mandatory and if you decide not to give it, you will still be able to use the requested services.</p>	
Customer service	<p>The need to perform a contract to which you are a party (Art. 6(1)(b) GDPR).</p> <p>The Company's legitimate interest in performing support functions that are not directly covered by the contract (Art. 6(1)(f) GDPR).</p>	<p>Your personal data will be retained for as long as necessary to fulfil contractual obligations and legal requirements (e.g. 10 years for tax purposes).</p> <p>If your data is processed on the basis of legitimate interests, it will be retained for as long as necessary to pursue that legitimate interest.</p>
Compliance with legal obligations	<p>Compliance with a legal obligation (Art. 6(1)(c) GDPR).</p>	<p>Your personal data will be stored for as long as necessary to fulfil legal obligations (e.g. 10 years for tax purposes).</p>
Protection of rights	<p>The Company's legitimate interest in establishing, exercising or defending its rights, including in court (Art. 6, para. 1, letter f) GDPR).</p>	<p>Your data will be stored for as long as the legitimate purpose remains valid and the data is necessary to achieve that purpose.</p>

4. Is the provision of data mandatory or optional? The provision of personal data is voluntary but necessary - with the exception of data indicated as optional - as if you decide not to provide it, it will not be possible to provide you with the requested services.

5. Who may have access to my personal data? Your personal data may be disclosed to our employees and collaborators who are involved in the management of the contractual relationship and legal affairs. The following categories of subjects may also become aware of your personal data. As data processors, they provide us with services that are instrumental to the performance of our activities: service providers IT (such as translation services), management and administrative services; external professionals and consultants, including auditors; external auditing firms, where applicable.

The complete list of these companies will be made available upon written request to the contacts listed below.

6. Will my personal data be disclosed to third parties? Your data may be disclosed to third parties belonging to the following categories: banks and payment institutions, to the extent necessary to make or receive payments in relation to the contract; the competent tax and fiscal authorities within the limits provided for by law; to judicial authorities or

police forces, in the cases provided for by law; to solicitors and law firms, where necessary for the pursuit of our legitimate interest in exercising or defending a right in court and out of court; to transferees of the contract or of our company or of a branch of our company or for third-party due diligence activities in relation to corporate transactions.

We would also like to point out that you have the option of controlling your Smart Home Devices, where compatible, with voice commands via Amazon Alexa and Hey Google. To do this, you must connect your Smart Home Devices to Alexa and Hey Google. If you choose to control your Smart Devices via Alexa and Hey Google, your personal data must be transmitted to Amazon and Google for output via Alexa and Hey Google, which use it to provide the service. This data may be of a personal nature. The processing of data by Amazon and Google is subject to Amazon's and Google's terms of use and data protection provisions. SBS has no control over this. For more information on data processing by Amazon and Google, please refer to Amazon's terms of use and data protection provisions for Alexa and Google's for Hey Google.

7. Cloud storage service. Depending on the camera model used and the service selected, it is possible to save videos to the cloud. Please note that this service is provided through an SBS partner, Tuya GmbH, which has been appointed as the data processor. The data is stored on a server located within the European Union.

8. Will my personal data be transferred outside the European Economic Area? If necessary for the use of certain services (e.g. IT services or translation services), the Company may transfer your personal data outside the European Economic Area, in particular to the United States and China. In this case, the transfer will take place in compliance with the provisions of the GDPR; in particular, the data will only be transferred after signing the Standard Contractual Clauses approved by the EU Commission with Decision No. 2021/914/EU or to countries that can guarantee an adequate level of personal data protection and are therefore recipients of an Adequacy Decision adopted by the EU Commission.

9. What are my rights and how can I exercise them?

You have the right to exercise the following rights provided for in Articles 15 to 22 of the Regulation at any time, free of charge and without formalities:

- the right to request access to personal data (i.e. the right to obtain confirmation as to whether or not personal data concerning you are being processed and, if so, to obtain access to the personal data, obtaining a copy thereof, and to the information referred to in Article 15 of the Regulation); the right to request access to personal data. 15 of the Regulation);
- the right to rectification (i.e. the right to obtain the rectification of inaccurate personal data or the completion of incomplete data pursuant to Article 16 of the GDPR);
- the right to erasure (i.e. the right to erasure of personal data, if one of the grounds referred to in Article 17 of the GDPR applies);
- the right to restriction of processing (i.e. the right to obtain, in the cases specified in Article 18 of the Regulation, the marking of stored data in order to limit their processing in the future);
- the right to data portability (i.e. the right, in the cases indicated in Article 20 of the Regulation, to receive your personal data in a structured, commonly used and machine-readable format and to transmit them to another data controller without hindrance);
- the right to object (i.e. the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data pursuant to Article 6(1)(e) (f a task carried out in the public interest or in the exercise of official authority) or (f) (legitimate interest) of the GDPR, including profiling based on those provisions); and
- the right to withdraw consent (i.e. if the processing is based on your consent, you have the right to withdraw it at any time). However, the withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal. You may withdraw any consent you have given by writing to the contact details below.

Please note that the provision of the services you have requested is in no way conditional upon the provision of the above consents.

We remind you that you always have the right to lodge a complaint with the Data Protection Authority (www.garanteprivacy.it) or with the relevant authority in the EU Member State where you reside, work or where the alleged infringement occurred.

10. How can I contact you and exercise my rights? Requests to exercise your rights, as indicated above, can be sent by email to info@sbsmobile.it, or by post to "SBS S.p.A., Via Circonvallazione s/n, 28010 Miasino".

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