







**INFORMATION NOTICE REGARDING THE PROCESSING OF ALBEN APP USERS' PERSONAL DATA
IN ACCORDANCE WITH ARTICLE 13 OF THE EU REGULATION 2016/679 (GDPR)**


	DATA CONTROLLER	<p>ESA S.p.A. Address: Via delle Canovine 2/4 - 24126 Bergamo (BG) Tel. no.: +39 0356227411 E-mail address: esa_privacy@esacombustion.it (“Company” or “Data Controller”).</p>
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	<p>PERSONAL DATA PROCESSED</p> <p>The Company provides users, as data subjects concerned with the processing, with information regarding the processing of their personal data collected following registration to the Alben App (hereinafter, the “App”) and its related use.</p> <p>Specifically, the personal data collected and processed through the App are the following common data:</p> <ul style="list-style-type: none"> • personal details, such as first name and last name, • contact information, such as email address; • user-related data, such as username and password; • other common data, such as company name and country. <p>The personal data listed above are hereinafter referred to as "Personal Data".</p>
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 DATA PROCESSING PURPOSES	 LEGAL BASIS FOR PROCESSING DATA	 DATA RETENTION PERIOD
To allow users to register for the App by creating accounts and use the App to control burners and check their parameters.	<p>Performance of a contract (art. 6, par. 1, letter b) of the GDPR).</p> <p>In the case of representatives of legal entity clients, the legitimate interests of the controller (Art. 6, letter f) of the GDPR).</p>	<p>The collected Personal Data will be stored until a deletion request is made by the user.</p> <p>However, in the event of user inactivity for a period of 2 years, the Personal Data collected through the App and the user's profile will be deleted, with prior notice to the user 30 days before deletion, unless the user accesses their reserved area within the specified time frame.</p> <p>Additionally, the user can request deletion at any time through the App or by directly contacting ESA at the addresses provided in this information notice.</p>
To send technical material to the user.	Performance of a contract (art. 6, par. 1, letter b) of the GDPR).	<p>The collected Personal Data will be stored until a deletion request is made by the user.</p> <p>However, in the event of user inactivity for a period of 2 years, the Personal Data collected through the App and the user's profile will be deleted, with prior notice to the user 30 days before deletion, unless the user accesses their reserved area within the specified time frame.</p> <p>Additionally, the user can request deletion at any time through the App or by directly contacting ESA at the addresses provided in this information notice.</p>

To provide support regarding the ESA products	Performance of a contract (art. 6, par. 1, letter b) of the GDPR).	The collected Personal Data will be stored until a deletion request is made by the user. However, in the event of user inactivity for a period of 2 years, the Personal Data collected through the App and the user's profile will be deleted, with prior notice to the user 30 days before deletion, unless the user accesses their reserved area within the specified time frame. Additionally, the user can request deletion at any time through the App or by directly contacting ESA at the addresses provided in this information notice.
Marketing purposes (sending business/promotional communication) via automatic contact methods (e.g. e-mail) on offers, discounts, promotions, and updates on the Company's products and/or services (so-called "direct marketing").	Consent, which is optional and can be withdrawn at any time (art. 6, par. 1, letter a) of the GDPR).	Persona Data are retained for 12 months from collection or until a request for consent withdrawal is made by the user.
If necessary to ascertain, exercise and/or safeguard Company rights in legal proceedings.	Legitimate interests (art. 6, par. 1, letter f) of the GDPR)	For the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies.
Once the aforementioned retention period has lapsed the Personal Data will be destroyed compatibly with the technical erasure and backup procedures and with the accountability requirements of the Data Controller.		

	<p>DATA PROVISION</p> <p>Personal Data must be provided to use the App and to respond to the user's requests. It is understood that the provision of Personal Data for processing purposes based on the data subject's consent is optional. Refusing to provide consent means the Company will not process the Personal Data for that purpose.</p>
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	<p>PARTIES AUTHORISED TO PROCESS DATA</p> <p>Personal Data may be processed by employees in Company departments that are responsible for carrying out the activities outlined above and have been authorised to process the Data and have received suitable operating instructions according to articles 29 of the GDPR and 2-<i>quaterdecies</i> of D.Lgs. 196/2003 as amended and adapted to the GDPR by D.Lgs. 101/2018.</p>
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	<p>DATA RECIPIENTS</p> <p>Personal Data may be communicated to parties operating as data controllers, such as supervisory bodies and authorities, and private or public organisations in general authorised to request Personal Data. Personal Data may be also processed, on behalf of the Company, by third parties designated as data processors who have been provided with proper operating instructions and who provide the Company with services instrumental to the purposes indicated in this privacy notice.</p>
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	<p>PERSONAL DATA TRANSFERS OUTSIDE THE EU</p> <p>No transfers of Personal Data outside the European Union are foreseen. In case Personal Data are transferred to countries outside the European Union (EU) or the European Economic Area (EEA) that have not been considered adequate by the European Commission, the transfer mechanisms set forth in Article 46 of the GDPR (such as standard contractual clauses) will be used, considering whether "additional measures" are provided to ensure a level of protection substantially equivalent to that required by EU law.</p>
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	<p>DATA SUBJECTS' RIGHTS - COMPLAINT TO THE SUPERVISORY BODY</p> <p>By contacting the Data Controller via e-mail sent to esa_privacy@esacombustion.it data subjects can ask the Company for access to Personal Data, or the correction or deletion of Personal Data, and also have the right to restrict processing of the Personal Data in the cases set out in article 18 of the GDPR.</p>
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Data subjects have the right to withdraw their consent at any time by contacting the Company or by accessing the designated area of the App and clicking the "withdraw" button. Such withdrawal will not affect the lawfulness of processing based on consent given prior to its withdrawal.

Data subjects have the right to object, according to article 21 of the GDPR, easily and free of charge, for reasons related to their particular situation in cases of processing based on legitimate interest or consent given for so-called "direct marketing" by contacting the Company.

Data subjects, in cases where processing is based on consent or contract and is carried out by automated means, can exercise the right to data portability under article 20 of the GDPR. This means they have the right to receive the Personal Data in a structured, commonly used and machine-readable format, and to transmit the Personal Data to another data controller without obstruction.

Data subjects have the right to lodge a complaint with the competent Supervisory Authority in the member state where they are resident or where they work, or the member state where the alleged breach took place.