

INFORMATIVE NOTE PURSUANT TO ART. 13 UE REGULATIONS 2016/679

Regulations related to the protection of the natural person with respect to the personal data treatment as well as the free circulation of the aforementioned data.

In accordance to the article 13 of the **UE Regulations 2016/679** "*Regulations related to the protection of the natural person with respect to the personal data treatment as well as the free circulation of the aforementioned data*" (shown below as "**Regulations**"), Manet Mobile Solutions Srl (shown below as "**MMS**"), based in Rome, via Nemorense n. 91, F.C. and VAT number 13464271009, in person of the legal representative Antonio Calia, acting as the Owner is required to provide some information related to the personal data treatment carried out during the usage of the Manet Smartphones.

1. Personal data nature

The following data or personal information can constitute object of treatment: nationality; e-mail; age group; gender; journey length; reason of travel; phone calls and mobile data entities amount; movements and geographical positions.

2. Purpose of the treatment to which the data are intended and juridical base of the treatment

Personal data gathered are treated for the following purposes:

- 2.1 **Management of the commercial and contractual relationships established, accounting/administrative**, which is to guarantee the use of the services provided by MMS, by using the smartphone, the complaint management, the fraud prevention, as well as the fulfilment of the possible connected law obligations. The provision of the personal data for the aforementioned purposes is not mandatory, nevertheless it is functional to the requested services and the possible refusal of such provisioning will make impossible to provide such services. The juridical base of the treatment is the execution of the contractual relationship of which the concerned person is part of (article 6, letter b) of the Regulations);
- 2.2 **Profiling activities aimed at marketing, direct and on behalf of third party companies**, that is the promotion of services and products, statistical surveys, market studies, fulfilled through traditional procedures (for example paper mail, calls carried out by sector operators) and automated communication instruments (for example pre-recorded calls, e-mails, fax, sms, mms, applications), as well as the usage of the geolocalization; the third party companies of which the marketing activity will be carried out on behalf of, are companies connected to MMS, the hospitality structure that provides the Manet smartphone or even companies belonging to sectors such as publishing, finance, economy, industry, luxury, services, telecommunications, commerce, insurance and non-profit. The provision of the data for the aforementioned purpose is optional and the juridical base is the well-informed consensus, free and expressed by the customer (article 6 letter a) of the Regulations);
- 2.3 **Profiling activities aimed at data communication to third parties companies for their own marketing purposes**, it will be possible to communicate data to third parties companies that are companies connected to MMS or even companies belonging to sectors such as publishing, finance, economy, industry, luxury, services, telecommunications, commerce, insurance and non-profit. The provision of

the data for the aforementioned purpose is optional and the juridical base is the well-informed consensus, free and expressed by the customer (article 6 letter a) of the Regulations).

3. Data treatment procedure and conservation duration

With respect to the purposes of the present informative note, the personal data are treated with automated and not tools, by specifically designated subjects, for the time strictly needed to achieve the objectives for which they are gathered and in full compliance with every precautionary measures, that will guarantee the security and the confidentiality, as well as the full respect of the legal obligations.

The personal data used for the purposes specified in this informative note will be stored:

- for the purpose of the point 2.1 for the needed time and not exceeding the purposes achievement and anyhow not larger than the duration of the service usage;
- for the purpose of the point 2.2 the data will be kept for 12 months;
- for the purpose of the point 2.3 the data will be kept for 12 months.

Following the revocation of the data treatment, data will be kept for 1 month, at most. The revocation of the treatment can be realized by contacting the owner of the data to the contacts information specified in point 6.

Once the aforementioned conservation times are finished, the data related to nationality, e-mail, age group, gender, journey length, reason of travel, phone calls and mobile data entities amount, movements and geographical positions will be made completely anonymous and they will be used only and exclusively for statistical research purposes in accordance with the article 89 of the UE Regulations.

By the end of the service usage the data will be stored and kept for 10 years further uniquely for the purpose of trial defense for contractual responsibility and for administrative-accounting purposes, in accordance with the obligations established by the law.

The use of the Manet smartphone and the services offered by the Owner are reserved for subjects legally able, on the basis of the national reference legislation, to conclude contractual obligations. The Owner implements prevention measures to protect his / her legitimate interest, such as the control of the tax code and / or other permitted and appropriate audits, in order to prevent unlawful access to specific services.

4. Data communication and dissemination area of interest

The personal data could be treated by subjects designated for the treatment in charge of the management of the requested services and/or by persons in charge of the treatment designated by MMS. The designated subjects, responsible for the data, are included in the following categories: lawyers, data owner consultants, hotel/accommodation structures, car rent companies. Every communication will take place anyhow in full compliance with the treatment purposes described above. It is possible to request the designated subjects list to the owner of the treatment to the contacts information specified in point 6.

The personal data could be communicated to third parties to fulfil the law obligations, MMS can transfer its personal data to state authorities, courthouses, external consultants and to comparable third parties that are public authorities and the transfer will be carried out following the requested or allowed measure by the applicable law, for example if the treatment is mandatory for the pursuing of the legitimate interests of MMS.

This can happen if, for example, it has been committed an administrative crime during the usage of the Manet smartphone.

If needed by particular requested services or products, the personal data can be communicated to third parties subjects that carry out, acting as autonomous owner of the treatment, tasks that are strictly connected and needed for the performances of the above-mentioned services or to the supply of the above-mentioned products (example: telecommunication operator connected to the SIM card, etc.)

MMS uses Amazon Web Services EMEA SARL (AWS) as the external cloud services supplier, with the server location within the UE.

MMS uses Send Grid (www.sendgrid.com) as provider for sending e-mail, with the cloud location in the USA. Data transfer was carried out by Send Grid in according with the Privacy Shield.

In case the subject that is conferring the data has an age lower than 16 years, such treatment is legitimate only if, and in the measure of, the consensus is given or authorized by the owner of the parental responsibility for which they are acquired the identification data and a copy of the identification document.

5. Handling of the rights by the involved subject

In accordance with the Regulations and with the applicable national norm, the involved subject can exercise the following rights, according to the established procedures and limitations:

- request the confirmation of the existence of his/her personal data (access right);
- know the origin;
- receive the intelligible communication;
- obtain information regarding the logic, the procedures and the purposes of the treatment;
- request the update, the correction, the integration, the deletion, the anonymization, the interruption of the treated data in violation of the law, including the data not needed any more to the pursuing of the purposes for which they have been gathered;
- when the treatment is a consensus-based treatment, one can request his/her personal data in a structured shape that can be read by a data calculator (computer) and in a format commonly used by electronic devices;
- the right to present a complaint to the control Authority.

For any questions and for the exercise of one's own rights, one can contact Manet Mobile Solutions Srl to the following phone number: +39 06 4040 9801 and/or to the following email address: info@manetmobile.com.

6. Data owner and treatment designated subjects

The owner of the above-mentioned data is Manet Mobile Solutions S.r.l., headquartered in Rome, Via Nemorense n. 91, F.C. and VAT number 13464271009, in person of the legal representative Antonio Calia.

The complete list of the treatment responsables and the treatment designated subjects is available in the MMS headquarter, and to request it one can contact directly the following phone number: +39 06 4040 9801 and/or the following email: info@manetmobile.com.



Shifting hospitality from realism to impressionism

The owner of the treatment takes advantage of a Data Protection Officer (D.P.O.) to monitor the legal protection related to the personal data, designated in accordance with the article 37 of the Regulations.

We remind you that you can, in every moment, contact the D.P.O. and send whichever question or request with respect to the personal data writing to the address: **dpo@manetmobile.com**.

7. Privacy informative note modifications

This Privacy informative note can demand an update occasionally – for example caused by the implementation of new technologies or the introduction of new services. We reserve ourselves the right to modify or integrate the present Privacy Informative note in any moment. We will publish the modifications on the website www.manetmobile.com and/or we will inform you consequently (for example, we will e-mail you).

TERMS OF SERVICE

The device you are using is a Samsung smartphone and is owned by Manet Mobile Solutions Srl (hereinafter "MMS") based in Rome, Via Nemorense 91, CAP 00199, tax / vat n. 13464271009.

The smartphone is provided to you together with a wall adapter, a USB-MicroUSB cable, a cover, a USB car charger, a suction-cup support for car and an accessory-holder bag. Inside the smartphone there is a SIM card enabled by default to voice and internet traffic. Specifically, you will have UNLIMITED National Voice Traffic (to landline and mobile); UNLIMITED 4G National mobile internet (including tethering); UNLIMITED International Voice Traffic towards allowed countries. The telephone traffic and Internet access are governed by the terms and conditions of the mobile operator Vodafone S.p.A., on which rests the responsibility for the quality of service and loss of data of any kind.

Manet Smartphones are provided by MMS with materials compliant with European regulations. Criminal liability regarding the use of both the SIM card and the mobile phone weighs on the customer. MMS reserves itself the sole right to block the SIM and to file a complaint with the competent police authorities.

The customer who, using the Manet Smartphone, accesses third party websites sharing information is aware that MMS has no control over the privacy policies of such third parties and assumes no liability for the actions of such third parties.

The technical specifications and the user manual of the smartphone can be found at the webpage <http://www.samsung.com/uk/support/> . The details about the voice and mobile internet services and about other offered services can be found in specific sections inside the smartphone.

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