

PRIVACY POLICY

Introduction.

This privacy policy (this “Policy”) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read this Policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information including our applications including, our WiGET mobile application (“App”).

It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

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Who we are.

We are Athena S.p.A., a company registered in Italy at the Chamber of Commerce of Vicenza at number 00589040245 and our registered office is at Alonte, 36045, Via delle Albere 13.

For the purposes of the General Data Protection Regulation ((EU) 2016/679 (the “GDPR”)), Athena S.p.A. is the Data Controller. If you have any concerns about the way we use your information or any questions about this Policy, we can be contacted via email at privacy@athena.eu.

The Data we collect about you and legal basis.

Personal Data (“Data”), or personal information means any information about an individual from which that person can be identified.

It does not include data where the identity has been removed (anonymous data).

Certain information is processed automatically when you use the App:

- ***Data collected during download.***

When you download the App, certain necessary information will be transmitted to the App Store you select (e.g. Google Play or Apple App Store), including but not limited to your username, email address, customer number of your account, time of download, and unique device identification number. The processing of this Data is carried out exclusively by the respective App Store and is beyond our control.

- ***Data collected automatically.***

This App may collect the following information: internet protocol (IP) address, browser type and version of the operating system, and language of the end device, time zone setting and location, browser plug in types and versions, operating system and platform and other technology on the devices you use to access this App.

This Data is automatically transmitted to us in aggregate form in order to prevent and eliminate misuse and malfunctions.

This Data processing is legitimated because you consent to the processing by providing the data in accordance with Art. 6 para. 1 lit. a) GDPR.

What we do to keep you Data secure.

We have appropriate security measures in place to prevent your Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Data on our instructions and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not always completely secure despite our reasonable efforts. Whilst we will reasonably protect your personal data, we do not guarantee the security of your data transmitted over the internet; any such transmission, including via our apps, is at your own risk and when we receive your information it will be kept in a secure environment protected by a combination of physical and technical measures such as encryption technologies or authentication systems to prevent any loss, misuse, alteration, disclosure, destruction, theft or unauthorised access.

We have in place procedures to deal with any suspected personal data breach and will notify you accordingly as well as notifying any applicable regulator where we are legally required to do so.

How long do we use and keep your Data.

We will only retain your Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

To determine the appropriate retention period for Data, we consider the amount, nature and sensitivity of the Data, the potential risk of harm from unauthorised use or disclosure of your Data, the purposes for which we process your Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Your rights.

Under certain circumstances, you have rights under the GDPR in connection with your Data. These are the following:

- Right of access to your personal data;
- Right to request correction of your personal data;
- Right of erasure of your personal data;
- Right to object to the processing of your personal data;
- Right to request the restriction of processing of your personal data;
- Right to request transfer of your personal data (data portability); and
- Right to object to the processing of your personal data.

If you wish to exercise any of the rights above please email privacy@athena.eu.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Data (or to exercise any of your other rights) is actioned accordingly. This is a security measure to ensure that Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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