SUZUKI MXtuner App
PRIVACY POLICY

Last updated 16 October 2026

This Privacy Policy explains how Athena S.p.A. processes personal data in connection with the SUZUKI MXtuner App (the "*App*"), including technical data generated during use and information you send us when requesting assistance. It also explains your rights under Regulation (EU) 2016/679 (the "*GDPR*") and how to contact us.

1. Who is responsible for your data

Athena S.p.A. ("*Athena*", "*we*" or "*us*") is the controller of the personal data described in this Policy. Our registered office is at Via delle Albere 13, 36045 Alonte (VI), Italy. Our registration number in the Vicenza Companies Register is 00589040245.

For privacy enquiries and to exercise your rights, please write to privacy@athena.eu or to our registered office.

2. Downloading the App

When you download the App, the relevant app-store provider, such as Apple App Store or Google Play, processes information relating to your store account, device and download and, where applicable, payment details. The store provider is responsible for its own processing under its privacy notice. This Policy describes Athena's processing and does not replace the privacy notices of those providers.

Apple and Google may separately collect usage and diagnostic information through their operating systems and app stores, under their own privacy notices and your device or account settings. These platform-managed processes are separate from any App backup you choose to send to Athena for assistance. Please consult the relevant provider's privacy information for details.

3. Data processed when you use the App

The App does not require Internet access for its core operation and does not automatically send its data backups to Athena. During technical assistance, our support team may ask you to send a backup of the App data stored on your device. The file is sent only if you choose to do so; it is not automatically uploaded merely because your device is connected to the Internet.

If you contact us, we process the contact details you provide, the content of your request and any technical information or attachments you choose to send. Please avoid sending personal data that are not needed to handle your request.

4. Device permissions

Your device's operating system may request permissions needed for a particular App function. You can manage these permissions in your device settings. Refusing or disabling a necessary permission may prevent the related function from working. A device permission does not, by itself, constitute consent to unrelated processing of personal data.

5. Why we process your data and on what basis

We process the data described above for the following purposes:

Technical operation and security: to detect and resolve malfunctions, prevent misuse and maintain the security and proper operation of the App. The legal basis is our legitimate interest in providing a

reliable and secure service, under Article 6(1)(f) GDPR. We rely on this basis only where that interest is not overridden by your interests or fundamental rights and freedoms.

Assistance and enquiries: to respond to your enquiries, to investigate reported issues and provide assistance. Where the request concerns a service under our contract with you, or steps you request before entering into a contract, the legal basis is Article 6(1)(b) GDPR. For other enquiries, we rely on our legitimate interest in responding to requests, under Article 6(1)(f) GDPR.

Legal obligations and claims: to comply with applicable legal duties, including handling data-protection requests, under Article 6(1)(c) GDPR. Where necessary to establish, exercise or defend legal claims, we rely on our legitimate interest in protecting our rights under Article 6(1)(f) GDPR.

Providing information when you contact us is voluntary. Without the information needed to assess your request, we may be unable to respond or provide the requested assistance. Necessary technical data are processed automatically when the relevant connection or function is used.

We do not use the personal data described in this Policy for advertising or profiling, or to make solely automated decisions that produce legal or similarly significant effects on you.

6. Who may receive your data

Access is limited to authorised Athena personnel and service providers who need the data for the purposes described above, including providers of IT, hosting, maintenance and technical-support services. Providers acting on our behalf are appointed as processors under Article 28 GDPR and are bound by confidentiality and appropriate data-protection obligations.

Data may also be disclosed to professional advisers where necessary for legal claims, and to courts or competent public authorities where required by law. We do not make your personal data publicly available.

7. Transfers outside the European Economic Area

Athena does not transfer the personal data covered by this Policy to countries outside the European Economic Area ("EEA"). App-store providers' independent processing is governed by their own notices, including their information on international transfers. If Athena's arrangements change, we will update this Policy and apply the safeguards required by Chapter V GDPR before making any such transfer.

8. How long we keep your data

Technical logs are kept only for the period needed to detect, investigate and resolve operational or security issues and verify that the issue has been addressed. We delete or anonymise them when they are no longer needed for those purposes.

Enquiry and assistance records are kept for the time needed to handle and document your request. Longer retention is limited to what is necessary to comply with a specific legal obligation or to establish, exercise or defend a legal claim, taking account of the applicable limitation periods and any ongoing dispute. We review retention needs and delete or anonymise data when the relevant need ends.

9. How we protect your data

We use appropriate technical and organisational measures to protect personal data against accidental loss, destruction or alteration and unauthorised access or disclosure. Access is restricted according to duties and the need to know, and persons authorised to process the data are subject to confidentiality obligations. We have procedures for handling personal-data breaches and will notify the competent authority and affected individuals where required by law.

10. Your rights and how to exercise them

Subject to the conditions and limits of the GDPR, you may request access to your personal data, correction of inaccurate or incomplete data, erasure, and restriction of processing. Where processing is automated and based on your consent or a contract, you may also request data portability.

Right to object: Where we rely on legitimate interests, you have the right to object at any time on grounds relating to your particular situation. We will stop processing unless we demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is necessary for legal claims.

To exercise your rights, contact privacy@athena.eu. We may request information necessary to confirm your identity if we have reasonable doubts. We normally respond free of charge within one month of receipt. If an extension is permitted because of the complexity or number of requests, we will inform you within that first month and explain the reasons; the extension will not exceed two additional months.

You may lodge a complaint with a competent supervisory authority, in particular in the EU Member State of your habitual residence, place of work or the alleged infringement.

11. Updates and related notices

We review this Policy when the App or our processing changes. The current version will be available through the App or its dedicated landing page, with the update date shown above. We will provide additional information about material changes where required by law. Visiting the landing page or other external websites is subject to the relevant website privacy and cookie notices.