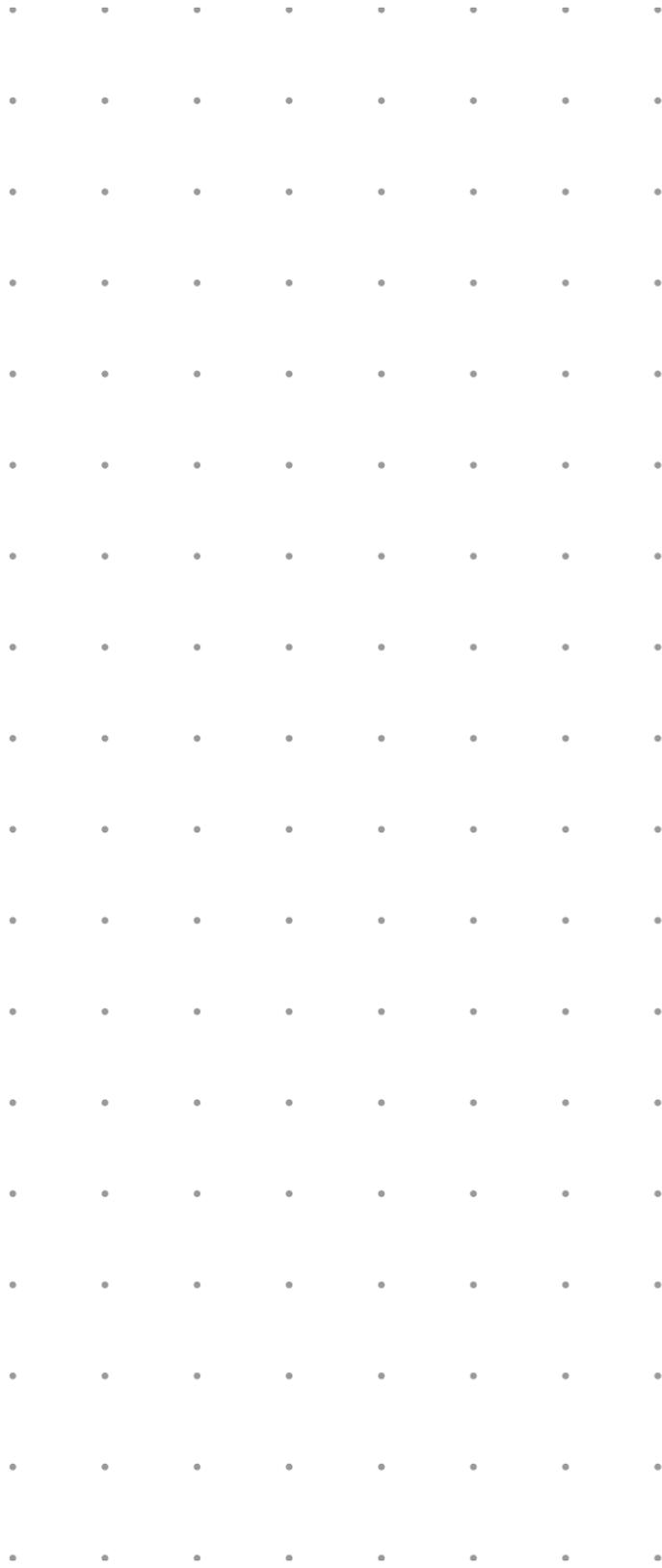


Icona Privacy Policy Ver 1.0



Information on the processing of personal data

Within the meaning of Art. 13 of Legislative Decree No 196 of 30.6.2003 and Art. 13 of Regulation (EU) 679/2016

This privacy statement describes the aims and means of the personal data of users, customers and licensees that visit the websites www.icona.it, www.livecare.it, www.acty.com, www.deskoala.com, www.livecarecontact.it (hereinafter for brevity the "sites") and/or that interact with the site, including downloading the ICONA software, and/or installing, using or acting as a reseller for the software licenses owned by ICONA.

Navigation of the site is unrestricted, free of charge, reserved for adults and does not require registration to the site. The submission of data by the User, Customer and Concessionaire is only required to achieve the Purposes identified below. In any case, it is revocable at any time by the user or customer by mere written request addressed to the data controller.

The information present on the site is provided free of charge by the Data Controller and in good faith; under no circumstances can the Data Controller be held responsible for any direct or indirect damage caused by the use of the site. This privacy statement may be subject to updates without prior warning: by browsing the site, the User, Customer or Concessionaire fully and automatically accepts any variations.

This privacy statement is only provided for the site and not for other websites that may be consulted by the User, Customer or Concessionaire via redirecting links: in the latter case, the privacy statement concerning the processing of personal data shall be provided by the data controller of the third party website

Definitions

The "Data Controller" is ICONA SRL, represented by its pro tempore legal representative, with registered office in Cinisello Balsamo (MI) in Viale Brianza 20, Tax Code 01110530191, VAT Number IT02812760961 (hereinafter also referred to for the sake of brevity as "ICONA").

The "Users" are the natural persons to whom the personal data processed by the Data Controller refer (hereinafter also referred to for the sake of brevity as the "Users" or "Data Subjects").

The "Customer/Licensee" is a company (hereinafter also referred to for the sake of brevity as the "Customer"), which has signed with an end user software license agreement with ICONA.

The "Concessionaire" is a company that has signed a concession contract with ICONA as a reseller of software user licenses.

Nature of the processed data

The Data Controller collects and processes the following categories of personal data:

- a) Data provided spontaneously by the user when voluntarily interacting with the site by sending the Data Controller a "Request Information" or otherwise - including through the Licensee - gets into contact with ICONA.
- b) Data provided spontaneously by the Customer/Licensee who, via the appropriate section of the site, registers to access the user license from their PC (or via the App in "master" mode), and to benefit from the free trial period.
- c) Data provided spontaneously by the Licensee as part of (or at the end of the conclusion) of concession contracts as a reseller of software user licenses concluded with ICONA.
- d) Data generated when the User browses the site: "browsing data" are automatically acquired when the user browses the site and are necessary to ensure that the site functions properly. These data are not collected with the purpose of identifying the User but only to source anonymous statistical information in aggregated form about the use of the site, and to verify that it works properly. The browsing data may be communicated by the Data Controller to the responsible Authorities in case of cybercrimes that cause damage to the site, and may be used by the Authorities to verify the responsibilities and identify those responsible for the same.

Purposes of the processing

The personal data communicated by the Users, Customers and Licensees will be processed by the data controller for the following purposes:

- 1) to interact with the user, customers and licensees and process their requests for information or assistance;
- 2) to fulfil the user license contract which has been signed and to send communications regarding the product; these include, by way of example only, commercial, administrative and marketing communications;
- 3) to fulfil the software user license reseller agreement which has been signed and to send communications regarding the product; these include, by way of example only, commercial, administrative and marketing communications;

- 4) To enable the Data Controller to carry out operations which are closely connected and instrumental to the correct management of the relations with the Users, Customers and Licensees;
- 5) To perform statistical analyses in an anonymous and aggregated form;
- 6) To fulfil the obligations of the laws or regulations in force;
- 7) To manage any complaints and enable the data controller to protect its rights.
- 8) Subject to the explicit consent of the User and the Customer, to contact the same by telephone or email, for the purposes of marketing, direct sales and the sending of promotional and commercial communications relative to the product;
- 9) Subject to the explicit consent of the User and the Customer, the personal data of the same can be communicated to third parties for the purposes of marketing, direct sales and the sending of promotional and commercial communications.

With regard to the processing of personal data referred to in points 8 and 9, the consent of the data subject is optional. However, in the case of lack of consent, it will not be possible to send commercial and promotional communications, and/or the communication of data to third parties for the same purposes.

In relation to the remaining purposes, the provision is an obligation of a contractual nature necessary for the purposes of concluding the contract or in any case necessary for the provision of the services requested. The data subject has the right to refuse to provide personal data. In the event of any lack of communication of such data, however, it will not be possible to conclude the contract.

Processing procedures

The data will be processed lawfully, according to the principles of correctness and in compliance with those of necessity, relevance, completeness and minimization, in relation to the purposes for which they are processed.

The data controller shall process the data of the User and Concessionaire mainly by electronic means suitable for guaranteeing, in relation to the purposes for which the data have been collected, the safety and confidentiality of the same, and to prevent unauthorized access to the data, for a period of time not exceeding that necessary for the purposes indicated above.

The personal data processed for the purposes indicated above shall be retained for the duration of the contract and thereafter for the period of time which ICONA is subject to retention obligations for tax purposes, and any other purposes provided for by the law or regulations.

The data will be processed at the data controller's local unit, located in Cinisello Balsamo (MI), in Viale Brianza, 20, and on servers located within the European Union.

The data will be processed exclusively by specially appointed personnel in charge of the processing, together with the data processing supervisors appointed by ICONA.

For certain processing operations, ICONA may also use third parties who shall follow, in any case, the instructions specifically provided by ICONA to ensure the security and confidentiality of the data entrusted to them.

In order to pursue the purposes indicated above, the data controller may also need to communicate the personal data of the User, Customer or Concessionaire to third parties belonging, by way of example only, to the following categories: parent and subsidiary companies; parties that perform technical and IT duties on behalf of ICONA; parties that provide services for the management of the information system of ICONA; parties that perform customer support activities (e.g. call centers, etc.); parties that perform filing and data entry activities; professional studios and companies in the field of consultancy and support relationships; parties that perform market research upon appointment from ICONA. The parties belonging to the categories reported above will process the Data belong to the Users, Customers and Licensees as Data Supervisors, appointed specifically for this purpose by the Data Controller. The list of the third parties to whom the data controller will communicate the personal data is available for consultation at the registered office of the data controller.

The personal data processed for the purposes indicated above are not subject to unauthorized disclosure, nor to any fully automated decision-making process.

The Customer/Licensee and Concessionaire shall be solely responsible for providing a suitable and complete privacy statement to its end customers (both in case of use of the program, and in the case of reselling licenses) concerning the methods and purpose of the data processing carried out.

Rights of the data subject

Each User/Customer/Concessionaire may exercise, by simple written request to be sent to the data controller, all rights conferred on it by the GDPR; by way of example but not limited to:

- i. The right of access to one's own personal data, to obtain confirmation of their existence care of the Data Controller, to know their origin and the purposes and procedures of the relative processing;
- ii. The right to know the data which identifies the Data Controller and any Data Supervisors and DPO, where appointed;
- iii. The right to know the parties or categories of parties to which the personal data have been communicated;
- iv. The right to obtain rectification of inaccurate data or the completion of incomplete data; deletion of personal data that concern them (upon the occurrence of any of the conditions specified in art. 17, paragraph 1 of the GDPR and in accordance with the exceptions provided for in paragraph 3 of the same article); the limitation of processing of their personal data (to have recourse to one of the hypotheses indicated in art. 18, paragraph 1 of the GDPR);

- v. The right to request and obtain from the Data Controller - in cases in which the legal basis for the data processing is the agreement or the consent, and the same is performed by automated means - one's own personal data in a structured and legible format by the automatic device, also in order to communicate these data to another Data Controller (the so-called right of portability of personal data);
- vi. The right to object to the processing of one's data for legitimate reasons;
- vii. The right to object to the processing for purposes of commercial information or for the sending of advertising material or for direct sale or market research

Communications

The User can contact ICONA at any time, for any request for clarification or information, at the local unit located in Viale Brianza, 20 - 20092, Cinisello Balsamo (MI), or at the e-mail address legal@icona.it.

icona