

**PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA
PURSUANT TO ART. 13 AND 14 OF THE REGULATION (EU) 2016/679**

Data subjects: Netmon Voce APP users on Android devices

This Privacy Policy refers to the data processing put in place by the NETMON VOCE application that enables phone calls, text messages and data traffic as well as offering additional features.

Basic Version

The NETMON VOCE APP is configured as a dialer, and offers features for managing the Call History, Messages, Phonebook, Keypad.

AUTHORISATIONS REQUIRED BY THE NETMON VOCE APP:

Contacts

The Netmon Voce App requires permission to access the phone's contacts.

Phone

The Netmon Voce App requires permission to access phone call management and phone status and permission to manage ND mode.

Call history

The Netmon Voce App requires permission to access the call history and permission to filter incoming calls.

Mobile data

The Netmon Voce App requires permission to access data traffic in aggregate mode.

Sms

The Netmon Voce App requires permission to send/read text messages.

FEATURES WITHOUT ACTIVATION

The user who installs the Netmon Voce APP can use the service in a personal capacity to make/receive phone calls or text messages with a single application tool, as well as use the features for managing the call history, messages, phonebook, and keypad.

In this mode, the APP does not communicate or transfer data externally, or to other APPs on the device. The Owner does not perform data processing with respect to the operation of the APP.

The only data that the Data Controller comes into contact with are any reviews that users make on the APP, which are handled directly by Google PlayStore, which, in this case, acts as an autonomous Data Controller.

Data Controller

The Data Controller is 'TECHNACY S.R.L.', with registered office and operational headquarters in Via Molveno 5, 48015 Cervia (RA), Italy, tax code and VAT registration number 02399920392. Further information on the privacy policies applied is available on the website www.technacy.it.

Purposes of the processing

- To allow the user to make/receive phone calls or text messages, make data traffic with a single application tool, as well as use the features for managing the call history, messages, phonebook, and keypad.

Data processing relative to the purposes

In this mode, the APP does not communicate or transfer data externally, or to other APPs on the device.

The only data that the Data Controller comes into contact with are any reviews that users make on the APP that are handled directly by the Google PlayStore, which, in this case, acts as an autonomous Data Controller.

Recipients

Personal data (reviews only) resulting from the use of the Netmon Voce APP will be processed exclusively by competent and duly appointed subjects, or identified as data processors for the proper management of the service, with guaranteed protection of the rights of the data subject. These subjects are distinguished in:

Data controllers: any other IT service providers;

Within the corporate structure: data will be processed by personnel expressly authorized by the Data Controller.

Retention Period.

No personal data are retained.

FEATURES WITH ACTIVATION

By activating the APP, the user, previously enabled by his company, uses the service in the company context on the basis of the policies defined by the company itself.

Data Controller

The company that uses the Netmon Voce service, and which establishes the purposes and means of data processing.

Data Processor

The Data Processor is 'TECHNACY S.R.L.', with registered office and operational headquarters in Via Molveno 5, 48015 Cervia (RA), Italy, tax code and VAT registration number 02399920392. Further information on the privacy policies applied is available on the website www.technacy.it.

Purpose of processing

- To allow the user and the company to have control and greater awareness in quantitative terms of the expenditure of calls/sms/data traffic generated in Italy and abroad.
- To display the thresholds and consumption of incoming and outgoing calls, SMS sent and received, and data traffic carried out according to the policies defined by the company on the Netmon dashboard.

Data processing relative to the purposes

Once the APP is installed, it can be activated through the available features. The APP will check whether the user's phone number has been enabled by the company; if it has not, it will continue to operate in "WITHOUT ACTIVATION" mode, deleting the acquired phone number.

If the user's phone number has been enabled, the APP will dispose of the company features described in the purposes. The APP counts the minutes and the number of text messages sent and received, and counts the data traffic performed, distinguishing them according to the tariff plans that the company has signed up to with the telephone operator and configured through its dashboard.

This data and information are then available on the company dashboard to ensure proper accounting and monitoring.

The APP does not transmit detailed data on individual calls or SMS and data traffic to the company dashboard, however, this information is collected for consumption accounting purposes only and is not visible on the company dashboard: anonymised recipient's phone number, date, time of the call or time the text message was sent/received, type of call/sms (incoming or outgoing), conversation duration (for calls only), response time (for calls only), telephone operator and countries of origin and destination of the call or text message, and aggregated information on data traffic made over a time period.

In devices with several sims, both corporate and personal, the only sim from which call/sms and data traffic data are collected is the corporate sim. For calls/sms made/received and for data traffic made using personal sims, the APP operates in 'NO ACTIVATION' mode, transferring no information.

Recipients

The personal data resulting from the use of the Netmon Voce APP will be processed exclusively by competent and duly appointed subjects, or identified as data processors for the proper management of the service, with guaranteed protection of the rights of the data subject. These subjects are distinguished in:

Data Processors: Technacy srl and any other IT service providers;

Within the company structure: data will be processed by personnel expressly authorised by the Data Processor.

Retention Period

Personal data will be kept at least until the end of the contractual relationship, and for a possible period when foreseen by such agreements.

Ancillary purposes

The information collected will also be used for ancillary purposes necessary to ensure the proper functioning of the service, such as: maintenance, support, and transmission security.

Processing methods and security

Personal data are processed electronically and telematically. All processing is carried out in compliance with the modalities set out in Articles 5, 32 of the GDPR and through the adoption of appropriate security measures.

Transfer of data to third countries

The NETMON VOCE service does not transfer personal data to countries outside the EU.

Disclosure

Your personal data will not be disclosed in any way.

Rights of the data subject, if applicable, pursuant to Regulation (EU) 2016/679: Art. 15, 16, 17, 18, 19, 20, 21, 22

1. The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her do exist, even if not yet registered, and to be provided such data in an intelligible form.
2. The data subject shall have the right to be informed of:
 - a. the source of personal data;
 - b. the purposes and methods of processing;
 - c. the logic involved in the event of data processed using electronic means;
 - d. the identification data of data controller, data processors and designated representative pursuant to art. 5, par. 2;
 - e. the entities or categories of entities to which the personal data may be disclosed or which may acquire the personal data as designated representative in the country's territory or as data processors or as entities in charge of data processing.
3. The data subject shall have the right to obtain:
 - a. the update or rectification of personal data as well as to have incomplete personal data completed, if he or she wishes;
 - b. the erasure, anonymization or blockage of personal data being processed in violation of the law, including data which do not need to be stored in relation to the purposes for which they have been collected or subsequently processed;
 - c. the confirmation that the entities to which data have been disclosed have been informed of the operations under letters a) and b), including their content, except where the fulfilment of this obligation proves to be impossible or would involve a disproportionate effort with respect to the right being protected;
 - d. the data portability.
4. The data subject shall have the right to object, in whole or in part:
 - a. to the processing of personal data concerning him or her for legitimate grounds, even if such data are in line with the purposes for which data are collected;
 - b. to the processing of personal data concerning him or her for direct marketing purposes, for receiving advertising materials or marketing communications or for market researches.

Moreover, the data subject shall have the right, for valid and legitimate grounds, to lodge a complaint with the Italian data protection supervisor (called “Garante per la protezione dei dati personali”) as supervisory authority in compliance with the established procedures. For further information as well as to exercise his or her rights under the EU Regulation, the data subject may contact the data controller using the above contact details.

Rev. 1/2023 – 30/03/2023