

Disclosure in accordance with EU Regulation 2016/67

DEAR SIR/MADAM,

engo Ltd with registered office at Via Forch no. 9, in 39040 Varna (Italy), VAT no. 00953940210, wishes to inform you that European Regulation 2016/679 provides for the protection of persons and other subjects with respect to the processing of personal data. According to the above law, this processing will be based on principles of correctness, legality and transparency and of protection of your confidentiality and your rights.

Under the terms of article 13 of said Regulation, therefore, we are providing you with the following information:

1. PURPOSES OF DATA PROCESSING

The data provided by you, and/or data provided by the remote maintenance system engo Remote Control as regards production and error protocols, will be processed for the following purposes: purposes related to invoicing and accounting, purposes related to the supply of the services required by contract such as the optimization of the functions and services provided including testing of the correct operation of the ice resurfacing machines, purposes related to solving problems connected with use of the application, statistical research/analysis on aggregate data aimed at measuring the operation of the application and continuous improvements, purposes related to technical aspects and purposes related to fulfilling the obligations provided for by law.

With your specific, express optional consent, data can also be used to send out promotional materials and, in general, for you to receive updates on our activities and services. For these purposes, provision of data is optional and failure to do so will have no consequences.

2. METHODS AND SCOPE OF DATA PROCESSING

The processing will be carried out by the Data Controller or by third parties limited to the same achieving the purposes specified above, mainly with electronic instruments, but also in paper form, for the time strictly necessary to achieve the purposes for which they have been collected.

Data will be processed by engo Ltd in its office in Varna, Italy, EU.

3. PROVISION OF DATA AND CONSENT TO PROCESSING

The provision of data used to perform the contract or carry out the service concerned by the commercial relationship is compulsory, insofar as failure to provide data will make it impossible to carry out the service.

The provision of data used for other purposes (such as, for example, promotion or marketing) is optional and failure to provide data will have no consequences. These indications of consent are managed within the documentation relating to quotations/offers.

4. PERSONAL DATA

The personal data may be communicated to employees or collaborators of the Data Controller who operate under the direct authority of the latter and receive in this regard adequate operating instructions. The personal data may also be communicated to parties external to the Data Controller, whose activity is necessary and strictly functional to providing the services.

The processing will not regard personal data included in the category of "sensitive" data, that is to say data capable of revealing the racial and ethnic origin, religious, philosophical or other kind of convictions, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union nature or personal data capable of revealing the health condition or sexual life.

5. DATA CONTROLLER

The Data Controller is engo Ltd with registered office at Via Forch no. 9, in 39040 Varna, VAT no. and Tax ID Code 00953940210, which is processing the personal data. To contact the Data Controller, please write to privacy@engo-ice.com.

6. DATA STORAGE

The data you provide will be stored for the time necessary to carry out the service and in compliance with the terms laid down by the law for data and document storage.

Please note that your data is not included in any automated decision-making processes.

7. RIGHTS IN RELATION TO THE DATA CONTROLLER

We would also remind you that you can exercise your rights at any time, asking the Data Controller to access the data or erase it, rectify it or restrict processing. Such requests may be sent by email to privacy@engo-ice.com. You also have the right to contact the supervisory authority if you believe that your data has been processed unlawfully or in a non-compliant manner.

Varna, January 30, 2020