

# Infodata Sistemi Srl

## Società Benefit



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## Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

### Data subject: Users of Infodata Software.

Infodata Sistemi Srl Società Benefit in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

#### Geolocation Data

During the provision of services, geolocation data of the user may be collected and processed, including latitude and longitude (and, where available, altitude, direction, and timestamp). Such data may be obtained through different technologies: GPS, Wi-Fi (built-in network scanning), cellular towers, Bluetooth beacons, or other location sensors. This data processing is intended to provide location-based features—such as local assistance, geo-aware services, or georeferenced navigation—only after the user has explicitly consented. Data processing will comply with GDPR principles, including data minimization, purpose limitation, privacy-by-design/default, and retention limitation.

#### Background Location Access – UNDERSEA Project

UNDERSEA needs to access your location in the background.

This app collects location data to record your vessel's GPS route even when the app is closed or not in use.

Location data is used solely to:

- Track your vessel's position during active tracking sessions
- Support the European UNDERSEA marine biodiversity research project

Your data is transmitted securely to the UNDERSEA project servers and handled in accordance with GDPR. It is never sold or shared with third parties.

You can stop data collection at any time by tapping **Stop Tracking**.

Purposes and legal base of the processing: your data will be processed for the following purposes necessary to comply with contractual or pre-contractual obligations:

- Clients management.

Processing procedures. Your personal data may be processed by the following ways:

- computer processing;
- use of data only on consultation.

All data are processed in compliance with the procedures specified in articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required.

Your data will only be processed by persons specifically authorised by the Data Controller, and specifically by the following categories of authorized persons:

- Service Desk;
- .

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of Recipients, including all the duly designated Data Processors:

- Google;
- intermediary;
- sub-contractors.

Distribution: Your personal data will not be distributed in any way.

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimisation of data, pursuant to art. 5 of the GDPR, the data storage period for your personal data is:

- set for a timing not larger than the one which implies its purpose achievement, given the aim to collect data, and collected and processed for the execution and fulfillment of contract purposes;
- set for a timing not larger than the supplied services fulfillment;
- established as a period of time not exceeding the purposes for which the data were collected and processed and complying with the compulsory times required by law.

Cookie management: in case you have doubts or concerns about the use of cookies you can always intervene to prevent the setting and reading, for example by changing the privacy settings in your browser in order to block certain types.

Since each browser - and often different versions of the same browser - also differ significantly from each other if you prefer to act independently through the preferences of your browser, you can find detailed information about the procedure required in the guide of your browser. For an overview of the most common browsing modes, please visit [www.cookiepedia.co.uk](http://www.cookiepedia.co.uk).

Advertising companies also allow you to opt out of receiving targeted ads, if desired. This does not prevent the setting of cookies, but interrupts the use and collection of some data by these companies.

For more information and cancellation options, visit [www.youronlinechoices.eu/](http://www.youronlinechoices.eu/).

Data Controller: the Data Controller, as defined by the Law, is Infordata Sistemi Srl Società Benefit (Strada per Vienna 55/1 , 34151 Trieste (TS), VAT no. 00933570327, contactable as follows: e-mail [info@infordata.it](mailto:info@infordata.it), telephone 040367189) in the person of Marko Petelin.

The Data Protection Officer (DPO) designated by the Data Controller pursuant to art. 37 of the GDPR is:

- Cyber365 Srls (Via Isacco Newton 26C , 35143 Padova (PD), VAT no. 05674360283, contactable as follows: e-mail [dpo@cyber365.it](mailto:dpo@cyber365.it), telephone 3463136983).

You are entitled, by application to the Data Processor, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

## **Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject**

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

- a. the source of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied if the data are processed by electronic devices;
- d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
- e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
- d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.