



DITEC GATE CONNECT PRO PRIVACY POLICY

Ditec S.p.A. is committed to protecting your personal data. This Privacy Policy describes how Ditec S.p.A. subjects the personal data (your “Data”) you disclose to us when you download, access, and use the App. This Privacy Policy explains:

- the types of personal data we collect when you use the DITEC GATE CONNECT PRO app
- how we collect your personal information
- how we use that information and for what purposes
- with whom we share the data and where
- how long we keep the data
- your rights and how you can contact us if you have other questions regarding the processing of your personal data
- how we may amend this Notice

Ditec S.p.A. [ID iscr. R.E.A. N° 1984181 of Milan with registered office in Via V. Pisani, 20 - 20124 Milan], as data controller, is responsible for the processing of your personal data as explained in this Privacy Policy.

WHAT PERSONAL DATA DO WE COLLECT?

We collect the following Data, which may be considered personal data under applicable laws and regulations, alone or together with other information about you:

- Public IP address of your mobile devices and router
- ID of the Ditec automation hardware device
- Password of the DITEC GATE CONNECT PRO App
- First name, last name, username, email address, country, VAT number, company name, phone number (landline or mobile), the company address, PEC if applicable, SDI code

HOW DO WE OBTAIN THE DATA?

- The public IP address of your mobile devices and router, the ID of the Ditec automation hardware device: we obtain this personal data when your device connects to the Internet.
- Email address, password, first name, last name, username, country, VAT number, company name, telephone number (landline or mobile), the company address, PEC (if any), SDI code: these are data entered by yourself during the registration phase in the Ditec app, for account creation; this registration creates a user profile on the Ditec cloud.

Ditec S.p.A.

Sede legale : Via V. Pisani, 20 • 20124 Milano • Italy

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Cod. fisc. / Part. IVA IT 00360610125 • Cap. Soc. € 1.521.000 int. vers. • R.E.A. N° 1984181 Milano

www.ditecautomations.com • info@ditecautomations.com

PURPOSE AND LEGAL BASIS FOR THE COLLECTION AND PROCESSING OF YOUR DATA

Public IP address of mobile devices and router

- Service provisioning and remote access: we collect the IP address to allow users to use the remote access service and manage automations via the app. This is critical to properly route communications between the mobile device, the router, and the DITEC GATE CONNECT PRO app.
- Diagnostics and technical support: we use the IP address to analyze any connection problems or service interruptions to provide effective and timely technical support to users.
- Security: monitoring IP addresses helps us detect and prevent suspicious or unauthorized activity, ensuring the security of the infrastructure and user data.

DITEC GATE CONNECT PRO app access profile ID and password

- Authentication and connection to the Cloud: we store the ID of the Ditec automation hardware device and the password of the DITEC GATE CONNECT PRO app access profile to allow users to connect to a Ditec automation via the Cloud. This facilitates remote access and use of the advanced features offered by the app.
- Synchronization and customization: the hardware device ID of the Ditec automation allows us to synchronize user settings and preferences, improving the user experience and offering personalized services.
- Access security: centralized credential management allows us to implement additional security measures such as two-factor authentication and access control.

Personal data (name, surname, username, e-mail address, country, VAT number, company name, telephone number (landline or mobile), company address, PEC if applicable, SDI code)

- Creation and management of the Specialized Technician account: this data is required to create the account and allow the Specialized Technician to access the services offered by the app. The username and email are used for authentication and official communication.
- Communications and customer support: We use contact information to send important notifications, service updates and to provide technical support.
- Legal and tax obligations: collecting data such as VAT number, company name, PEC and SDI code (available only in some Countries) is necessary to comply with legal and tax obligations, especially in the case of corporate or professional customers.
- Customization of the service: knowing the country and other details allows us to offer content and services tailored to the specific needs of users, including support in the local language and compliance with regional regulations.

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Managing sensitive data on the Cloud

Security and data protection:

- Encryption: sensitive data is encrypted both during transmission (using SSL/TLS protocols) and at rest in our databases, using advanced encryption algorithms.
- Restricted access: access to data is restricted to authorized personnel who need the information to perform their duties, in accordance with the principle of minimum privilege.
- Robust authentication: we implement secure authentication mechanisms, including two-factor authentication, to protect user accounts and prevent unauthorized access.

Regulatory compliance:

- GDPR and local regulations: personal data is processed in accordance with the GDPR and other applicable data protection laws. Users have the right to access, rectify, delete and restrict the processing of their data at any time.

TO WHOM CAN WE COMMUNICATE THE DATA?

We may disclose your personal data for the above-mentioned purposes to:

- ASSA ABLOY Shared Technologies, an EU-based part of the ASSA ABLOY group
- ASSA ABLOY Entrance Systems Division, an EU-based part of the ASSA ABLOY group
- the technical support of Ditec S.p.A.
- to Amazon Web Services (AWS)
- if required by law or by a court or competent authority, and/or to a purchaser or prospective purchaser of our company

We may use Google Analytics when we receive data for the purposes set out above. For information on how Google collects and processes data, please refer to 'How Google uses information provided by apps or sites that use its services' at <http://www.google.com/policies/privacy/partners/>.

We take the measures required by law to protect any personal data transferred to a third party.

TRANSFER

We may share your information with other companies in our group or with our trusted subcontractors to provide you with the Services and for the purposes set out in this Privacy Policy. Data processing may therefore take place in countries other than your home country. As this Privacy Policy explains, data collected in the European Economic Area (the 'EEA'), may be stored, processed or transferred outside the EEA. In some cases, these countries offer a lower level of protection than within the EU/EEA. To provide your personal data with a sufficient level of protection when we transfer it to countries outside the EU/EEA, we use standard contractual clauses approved by the European Commission. The standard contractual clauses are available at the following link: https://ec.europa.eu/info/law/law-topic/data-protection_en

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HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain the IP address of your DITEC GATE CONNECT PRO device and your personal data (first name, last name, email, etc.) for the duration of your account. After a deletion request, the data will be deleted within 30 days, unless legal obligations require a longer retention period.

YOUR RIGHTS

With regard to the personal data, we hold about you, you have the right to:

- request a copy of the personal data we hold about you in our records (including the right to be informed whether or not we are processing personal data about you, the categories of data being processed and the purpose of the processing)
- request the rectification or erasure of your personal data (although this may mean that we are no longer able to continue to provide services to you or that we can only provide limited services to you). Please note that we may refuse to process your request if the processing is permitted or required by law or other relevant legal basis
- object to the use of your personal data if we base the processing on our legitimate interest. If you object, we will refrain from further processing your personal data unless we can demonstrate compelling legitimate grounds for processing which override your interests or your rights and freedoms or for the establishment, exercise or defense of legal claims
- ask us to limit the processing of your personal data (e.g. if the processing is no longer necessary, if you believe that your data are not accurate, etc.)
- request that the personal data you have communicated to us that are subject to automatic processing and/or in accordance with a contract between you and Ditec S.p.A. be sent to you in a structured, commonly used and machine-readable format and transmit such data to another data controller, if technically possible
- request to delete your account and personal data: if you wish to delete your account, you can do so at the following URL <https://ditec-iot-account-delete.onrender.com/>

In certain circumstances, we may need to restrict the above rights to safeguard the public interest, our interest and/or defend a right.

Notify us of any requests regarding the processing of your personal data by sending an e-mail to privacy@ditecautomations.com or by writing a letter to the 'Ditec Data Protection Officer' at Ditec S.p.A. - L.go U. Boccioni, 1 - 21040 Origgio (VA) - Italy

Please note that we may contact you and ask you to confirm your identity to ensure that we do not disclose your personal data to unauthorized persons and that, before acting, we may ask you to specify your request. Once you have confirmed your identity, we will handle your request in accordance with applicable law. Remember that even if you object to certain processing of your personal data, we may continue such processing if the law permits or requires it, for example to comply with legal or contractual requirements.

If you are dissatisfied with our processing of your personal data, you can lodge a complaint with the authority 'Garante per la protezione dei dati personali' based in Piazza Montecitorio, 121 - 00186 Roma - Tel. +39 06

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69677 1 / e-mail: garante@garanteprivacy.it or with the supervisory authority of the country where you live or work, if different.

The following site (https://edpb.europa.eu/about-edpb/board/members_en) at the European Data Protection Board lists the relevant authorities by country.

HOW CAN WE AMEND THIS POLICY?

We reserve the right to update this privacy policy from time to time in response to changing legal, regulatory or operational requirements. We will notify you of such changes (and of when they will come into effect). Your use of the DITEC GATE CONNECT PRO app and service, even after such updates have taken effect, will constitute your acceptance of those changes. If you do not agree to an update of this privacy policy, you should no longer use this app and/or related website.

CONTACT

Any questions about the way the Data is used should be sent to privacy@ditecautomations.com.

Alternatively, we invite you to send any request for information on how your personal data is processed by DITEC (as data controller) to the 'Ditec Data Protection Officer' at Ditec S.p.A. - L.go U. Boccioni, 1 - 21040 Origgio (VA) - Italy

Privacy Policy Date: 2026-01-28

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THIRD-PARTY LICENCES AND SUPPLIERS

1. Appwrite

- **Purpose:** Authentication management, user database and serverless functions for the backend.
- **Reason for use:** Enables secure and centralized management of user accounts, including login, registration and password recovery operations. Provides synchronization functionality between app and cloud backend

2. AWS (Amazon Web Services)

- **Purpose:** Cloud infrastructure provider for the app's backend and databases.
- **Reason for use:** Provides scalability and security for data storage and execution of app services. Supports global infrastructure resilience and GDPR compliance. Data is protected via encryption and complies with privacy regulations.

3. CockroachDB

- **Purpose:** Distributed database for storing automations and events generated by the app. Hardware device data (ID, configurations) and usage logs are stored
- **Reason for use:** Ensures high availability, reliability and scalability for structured data such as automations configurations and event logs

4. Aiven (PostgreSQL)

- **Purpose:** Provider of PostgreSQL as a service for storing structured data.
- **Reason for use:** Used for critical data and configuration management. Provides scalability and security without infrastructure complexity. Provider for PostgreSQL infrastructure used to store system data and configurations

5. Google Analytics

- **Purpose:** Monitoring and analysis of user interactions with the app.
- **Reason for use:** Allows us to collect anonymous information about app usage to improve user experience and optimize functionality. Collects anonymous data such as usage statistics (non-personal). Link to Google's policy: <https://policies.google.com/privacy>

6. Sentry

- **Purpose:** Error monitoring and performance diagnostics.
- **Reason for use:** Allows detection, analysis and correction of technical problems that could affect performance or user experience. Information on application errors is collected anonymously.

7. Microsoft Clarity

- **Purpose:** Analysis of user behavior on the app.
- **Reason for use:** To display anonymous interactions to improve the user interface and overall experience.

8. Hotjar

- **Purpose:** Analysis of user experience (session replay, heatmap).
- **Reason for use:** Provides insights into usability and pain points in the app, helping to improve flows and ergonomics. Hotjar records anonymous interactions for purposes of user experience analysis and improvement. Link to the policy: <https://www.hotjar.com/privacy/>

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