



DITEC GATE CONNECT PRO APP

PRIVACY POLICY

1. INTRODUCTION

Ditec S.p.A. is committed to protecting your personal data.

This Privacy Policy explains how **Ditec S.p.A.** collects, uses, stores, and protects personal data when you download, access, and use the **DITEC GATE CONNECT PRO** App (the “**App**”) and related services (collectively, the “**Services**”).

In particular, this Privacy Policy explains:

- which type of personal data we collect;
- how and from which sources personal data are collected;
- for which purposes and on which legal bases personal data are processed;
- with whom personal data may be shared and where they may be transferred;
- how long personal data are retained;
- your rights under applicable data protection laws and how to exercise them;
- how this Privacy Policy may be updated;
- which third-party services we use.

2. DATA CONTROLLER

Ditec S.p.A.

Identified by R.E.A. No. 1984181 – Milan

With registered office: Via V. Pisani 20, 20124 Milan, Italy

acts as **Data Controller** pursuant to Regulation (EU) 2016/679 (**GDPR**) and is responsible for the processing of your personal data as described in this Privacy Policy.

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

3. TYPES OF PERSONAL DATA WHICH ARE COLLECTED

Depending on how you use the App, we may collect the following categories of personal data:

a) Technical and device data

- Public IP address of your mobile device and/or network router
- ID of the Ditec automation hardware device

b) Account and authentication data

- Username
- Password of the DITEC GATE CONNECT PRO App (stored in encrypted form)

c) Identification and contact data

- First name and last name
- E-mail address
- Telephone number (landline and/or mobile)
- Country of residence
- Home/site address

4. HOW WE COLLECT PERSONAL DATA

Personal data are collected:

- **automatically**, when your device connects to the Internet and communicates with the App or Cloud services (e.g. IP address, device ID)
- **directly from you**, when you register an account and enter the required information within the App, creating a user profile on the Ditec Cloud

5. PURPOSES AND LEGAL BASES OF PROCESSING

Technical and network data (IP address, device ID)

Personal data is processed for the following purposes:

- **Provision of services and remote access**
to enable communication between the App, the automation device, and the Cloud;
- **Diagnostics and technical support**
to detect, analyze, and resolve connectivity or service issues;
- **Security and fraud prevention**
to detect unauthorized access, misuse, or abnormal activity.

Legal basis: performance of a contract and legitimate interest (Art. 6(1)(b) and (f) GDPR).

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Account credentials and access data

Personal data is processed to:

- authenticate users and enable secure access to the Services;
- synchronize automation settings and user preferences;
- implement security measures (e.g. access control, multi-factor authentication where applicable).

Legal basis: performance of a contract (Art. 6(1)(b) GDPR).

Identification and contact data

Personal data is processed to:

- create and manage the user account;
- communicate service information, updates, and support messages;
- comply with legal, accounting, and tax obligations where applicable;
- adapt services to the user's country and regulatory environment.

Legal basis: performance of a contract, legal obligation, and legitimate interest (Art. 6(1)(b), (c), and (f) GDPR).

6. DATA SECURITY AND CLOUD MANAGEMENT

We have adopted appropriate technical and organizational measures to protect personal data, including:

- **Encryption** of data in transit (SSL/TLS) and at rest;
- **Access controls** based on the principle of least privilege;
- **Secure authentication mechanisms**, including multi-factor authentication where applicable.

Personal data are processed in compliance with the GDPR and applicable national data protection laws.

7. DATA RECIPIENTS

Your personal data may be shared, where necessary, with:

- **ASSA ABLOY Shared Technologies** (EU-based);
- **ASSA ABLOY Entrance Systems Division** (EU-based);
- **Ditec S.p.A.** authorized personnel and technical support (EU-based);
- **Amazon Web Services (AWS)** for cloud infrastructure services;
- public authorities or judicial bodies where required by law;
- potential purchasers or successors in the context of corporate transactions.

We may also use **Google Analytics**. For more information, please refer to:

<https://www.google.com/policies/privacy/partners/>

All data transfers are subject to appropriate safeguards.

8. INTERNATIONAL DATA TRANSFERS

Personal data may be transferred outside the European Economic Area (EEA).

Where this occurs, transfers are carried out using **Standard Contractual Clauses** approved by the European Commission to ensure an adequate level of data protection.

More information is available at:

https://ec.europa.eu/info/law/law-topic/data-protection_en

9. DATA RETENTION

Personal data is retained only for as long as the Account remains active.

When the user requests Account deletion through the App, all personal data is **deleted immediately and automatically**, except for any information that must be retained to comply with legal obligations unrelated to the Account (such as administrative or tax requirements).

10. YOUR RIGHTS

You have the right to:

- access your personal data;
- request rectification or erasure;
- object to processing based on legitimate interest;
- request restriction of processing;
- request data portability;
- request deletion of your account and personal data

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Certain rights may be limited where permitted or required by law.

Requests can be sent to:

privacy@ditcautomations.com

or by mail to:

Ditec Data Protection Officer

Ditec S.p.A. – L.go U. Boccioni 1

21040 Origgio (VA), Italy

If you are dissatisfied, you may lodge a complaint with the **Italian Data Protection Authority (Garante per la Protezione dei Dati Personali)** or with your local supervisory authority.

11. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time.

Any changes will be communicated through the App or other appropriate means.

Continued use of the App after such changes constitutes acceptance of the updated Privacy Policy.

12. CONTACT

For any questions regarding the processing of personal data:

privacy@ditcautomations.com

13. THIRD-PARTY LICENCES AND SUPPLIERS

1. **Firebase:** Platform used for secure user login management and app crash monitoring to improve stability and security
2. **Lokalise:** Service for centralized management of translation files, ensuring linguistic consistency across app versions
3. **SendGrid:** Service for sending emails to users, such as notifications, confirmations, and important communications
4. **Camera:** Access to the device camera, required for features such as QR code or image scanning
5. **Google Analytics:** Analysis of interactions
6. **Bluetooth (scan, connect, advertise):** Used for connecting and communicating with nearby devices, essential for automation control
7. **Location:** Data required exclusively to enable proper functioning of Bluetooth Low Energy (BLE), in compliance with operating system policies

Privacy Policy date: February 28, 2026

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