# **ENEA Mobile Sun Compass Privacy Policy**

This Application collects some Personal Data of its Users. This document can be printed using the print command present in the settings of any browser.

# Identity and contact details of the data controller

The Data Controller is ENEA - National Agency for New Technologies, Energy and Sustainable Economic Development, based in Rome 00196, Lungotevere Thaon di Revel, 76. You can contact the Data Controller by writing to the above address, or by sending an e-mail to the following certified e-mail address: enea@cert.enea.it.

# Contact details of the data protection officer (DPO)

The Data Protection Officer (DPO) for ENEA was appointed with Provision n 34/2020 / PRES of 6 February 2020. For communications relating exclusively to the processing of personal data, he can be contacted at the following e-mail address: <a href="mailto:uver.dpo@enea.it">uver.dpo@enea.it</a>.

### Types of data collected

The ENEA Mobile Sun Compass app is a measurement tool: it collects scientific data only when the user voluntarily makes a measurement. The data collected includes the date and time of the survey of a measurement, geographical coordinates of the survey site (with an approximation of about 20 km<sup>2</sup>), type of method used for the measurement, level of accuracy of the measurement, value obtained from the measurement of the application, value of the measurement obtained from the smartphone magnetometer, version of the application and a unique identification number created, at the time of installation of the app, based on the date and time of installation and not linked to any data personal data and nor to the technical data of the mobile phone. For the purpose of collecting Personal Data, either independently or through third parties, this Application requires the following permissions: Camera Permission; Localization Permission; Sensors Permission. Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically during the use of this Application. Unless otherwise specified, all data requested by this application are mandatory. If the User refuses to communicate them, it may be impossible for this Application to provide the Service. In cases where this Application indicates some Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or on its operation. Any use of Cookies - or of other tracking tools - by this Application or by the owners of third party services used by this Application, unless otherwise specified, has the purpose of providing the Service requested by the User, in addition to further purposes described in this document and in the Cookie Policy, if available.

# Method and place of processing of the collected data

### **Processing methods**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data. The processing is carried out using informatics and / or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other subjects involved in the organization of this Application (employees and collaborators of the Data Controller, such as research staff, system administrators) or external subjects (researchers of Public Bodies and Institutions with whom the ENEA has signed collaboration agreements regarding the issues covered by the data collected by the app).

# Legal basis of the processing

The Data Controller processes Personal Data relating to the User if one of the following conditions exists:

• the processing is necessary for the execution of a task of public interest or for the exercise of public authority vested in the Data Controller.

# Place

The Data is processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For more information, please contact the Data Controller.

#### **Retention period**

The Data are processed and stored for the time required by the purposes for which they were collected. At the end of the retention period, the Personal Data will be deleted. Therefore, at the end of this term the right of access, cancellation, rectification of the Data can no longer be exercised.

# Purpose of processing the collected data

The User Data is collected to allow the Owner to provide the Service, comply with legal obligations, respond to requests or executive actions, protect their rights and interests (or those of Users or third parties), identify any malicious activities. or fraudulent, as well as for the following purposes: Permissions for access to Personal Data on the User's device, Statistics, Registration and authentication.

#### Permissions for access to Personal Data on the User's device

Depending on the specific device used by the User, this Application may require some permissions to access the User Data present on the device itself, as described below. These permissions must be provided by the User before any information can be processed. Following the release, the permit can be revoked by the User at any time. In order to revoke the permissions, the User can use the system settings or contact the Owner at the addresses indicated in this document. The procedure for checking permissions may vary depending on the device and software used by the User. Please consider that the revocation of one or more permissions may have consequences on the correct functioning of this Application. In the event that the User grants the permissions indicated below, the related Personal Data may be processed (accessed, modified or removed) by this Application.

#### **Camera Permission**

Used to access the camera, for the sole purpose of calculating geographic north. The app does not record or store the images framed by the mobile phone camera.

#### **Localization Permission**

Used to access the location of the User's device. The location of the user is required precisely in order to perform a reliable measurement, but the location data is approximated at the time the Personal Data is collected. This Application can collect, use and share the approximate location of the User, exclusively on the occasion of a measurement performed by the user himself through the app, for scientific purposes.

#### **Sensors Permission**

Used to perform calculations for the determination of geographic and magnetic north. The sensors used are, respectively, the accelerometer and the magnetometer. Details on the processing of Personal Data Personal Data is collected for the following purposes and using the following services:

Statistics

#### **User rights**

Users can exercise certain rights with reference to the Data processed by the Data Controller. In particular, the User has the right to:

- withdraw consent at any time. The User can revoke the consent to the processing of their Personal Data previously expressed.
- oppose the processing of their data. The user can oppose the processing of their data when it occurs on a legal basis other than consent. Further details on the right to object are indicated in the section below.
- access their data. The user has the right to obtain information on the data processed by the owner, on certain aspects of the processing and to receive a copy of the data processed.
- verify and ask for rectification. The User can verify the correctness of their Data and request its updating or correction.
- obtain the limitation of the processing. When certain conditions are met, the User may request the limitation of the processing of their Data. In this case, the Data Controller will not process the Data for any other purpose other than their conservation.
- obtain the cancellation or removal of their Personal Data. When certain conditions are met, the User can request the cancellation of their Data by the Owner.
- propose a complaint. The User can lodge a complaint with the competent personal data protection supervisory authority or take legal action.

### Details on the right to object

When Personal Data is processed in the public interest, in the exercise of public authority vested in the Owner, Users have the right to oppose the processing for reasons related to their particular situation.

## How to exercise your rights

The above rights are exercised with a request addressed to the Data Controller, by sending an e-mail message to the address <u>privacy@enea.it</u>. The request is formulated freely and without formalities by the interested party, who has the right to receive appropriate feedback within a reasonable time, depending on the circumstances of the case. The interested party may use, for the exercise of his rights, non-profit

bodies, organizations or associations, whose statutory objectives are of public interest and which are active in the field of protection of the rights and freedoms of the interested parties with regard to to the protection of personal data, giving, for this purpose, a suitable mandate. The interested party may also be assisted by a trusted person. You can receive more information on the purposes and methods of processing personal data by writing to the e-mail address privacy@enea.it and indicating in the subject "Privacy Sun Compass Mobile App". To find out about their rights, propose a complaint / report / appeal and always be updated on the legislation on the protection of individuals with regard to the processing of personal data, the interested party can contact the Guarantor Authority for the protection of personal data, by consulting the website at <a href="http://www.garanteprivacy.it/">http://www.garanteprivacy.it/</a>

#### Further information on the treatment

#### **Defense in court**

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its eventual establishment for the defense against abuse in the use of this Application or related Services by the User. The User declares to be aware that the Owner may be obliged to disclose the Data by order of the public authorities.

# System log and maintenance

For needs related to operation and maintenance, this Application and any third party services used by it may collect system logs, i.e. files that record the interactions and which may also contain Personal Data.

# Information not contained in this policy

Further information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact details.

### Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if possible, on this Application as well as, if technically and legally feasible, by sending a notification to Users through one of the extremes of contact he has.