

Privacy Policy of S1MPL0

This Application collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

Owner and Data Controller

Domethics s.r.l. - via Pietro Micca, 20 - 10121 Torino (Italia)

Owner contact email: simplo@domethics.com

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: device logs; email address; Usage Data; country; ZIP/Postal code; gender; date of birth; geographic position; Contacts permission; Approximate location permission (non-continuous); Phone permission; Sensors permission; Motion sensors permission; Bluetooth sharing permission; Microphone permission, without recording; Biometric Data access permission; Health Data read permission; Call permission; Camera permission, without saving or recording; Trackers; Data communicated while using the service; first name; last name; phone number; password.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies - or of other tracking tools - by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as

required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Beta Testing, Contacting the User, Managing web conferencing and online telephony, Hosting and backend infrastructure, Location-based interactions, Device permissions for Personal Data access, Collection of privacy-related preferences, Registration and authentication and Displaying content from external platforms.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Device permissions for Personal Data access

Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.

The exact procedure for controlling app permissions may be dependant on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of this Application.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by this Application.

Approximate location permission (non-continuous)

Used for accessing the User's approximate device location. This Application may collect, use, and share User location Data in order to provide location-based services.

The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for this Application to derive the approximate position of the User on a continuous basis.

Biometric Data access permission

Used for accessing the User's biometrical Data and/or authentication systems, such as for instance, FaceID.

Bluetooth sharing permission

Used for accessing Bluetooth related functions such as scanning for devices, connecting with devices, and allowing data transfer between devices.

Call permission

Used for accessing a host of typical features associated with telephony.

Camera permission, without saving or recording

Used for accessing the camera or capturing images and video from the device. This Application does not save or record the camera output.

Contacts permission

Used for accessing contacts and profiles on the User's device, including the changing of entries.

Health Data read permission

Allows reading the User's health Data.

Microphone permission, without recording

Allows accessing and recording microphone audio from the User's device. The recording feature is not used

on this Application.

Motion sensors permission

Used for accessing the User's device motion sensors to measure the User's activity such as step counts, stairs climbed, and movement type (walking, cycling, etc.).

Phone permission

Used for accessing a host of typical features associated with telephony. This enables, for instance, read-only access to the "phone state", which means it enables access to the phone number of the device, current mobile network information, or the status of any ongoing calls.

Sensors permission

Used for accessing data from sensors that Users may use to measure what is happening inside their body, such as for instance, heart rate.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Beta Testing

This type of service makes it possible to manage User access to this Application, or parts of it, for the purpose of testing a certain feature or the entire Application. The service provider may automatically collect data related to crashes and statistics related to the User's use of this Application in a personally identifiable form.

Beta by Crashlytics (Google Ireland Limited)

Beta by Crashlytics is a beta testing service provided by Google Ireland Limited.

Personal Data processed: device logs; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#).

Collection of privacy-related preferences

This type of service allows this Application to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

iubenda Consent Database (iubenda srl)

The iubenda Consent Database allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent. In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; Trackers.

Place of processing: Italy - [Privacy Policy](#).

iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information and in particular to the use of Cookies and other Trackers on this Application.

Personal Data processed: Trackers.

Place of processing: Italy - [Privacy Policy](#).

Contacting the User

Mailing list or newsletter (this Application)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data processed: country; date of birth; email address; gender; Usage Data; ZIP/Postal code.

Device permissions for Personal Data access

This Application requests certain permissions from Users that allow it to access the User's device Data as described below.

Device permissions for Personal Data access (this Application)

This Application requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Approximate location permission (non-continuous); Biometric Data access permission; Bluetooth sharing permission; Call permission; Camera permission, without saving or recording; Contacts permission; Health Data read permission; Microphone permission, without recording; Motion sensors permission; Phone permission; Sensors permission.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Maps widget (Google Ireland Limited)

Google Maps is a maps visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers.

Place of processing: Ireland - [Privacy Policy](#).

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable this Application to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Application.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Firebase Cloud Firestore (Google LLC)

Firebase Cloud Firestore is a hosting and backend service provided by Google LLC.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#); Germany - [Privacy Policy](#).

Firebase Cloud Functions (Google LLC)

Firebase Cloud Functions is a hosting and backend service provided by Google LLC.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#); Germany - [Privacy Policy](#).

Firebase Hosting (Google LLC)

Firebase Hosting is a hosting service provided by Google LLC.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#); Germany – [Privacy Policy](#).

Firestore Realtime Database (Google LLC)

Firestore Realtime Database is a hosting and backend service provided by Google LLC.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#); Germany – [Privacy Policy](#).

Location-based interactions

Geolocation (this Application)

This Application may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorisation has been provided, the User's location data may be tracked by this Application.

Personal Data processed: geographic position.

Managing web conferencing and online telephony

This type of service allows this Application to manage the deployment, administration, hosting, recording, distribution and analysis of online telephony and web conferencing in order to communicate with Users. The Personal Data collected depend on the information provided by the Users while using the respective service.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

Agorà

live video streaming API

Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Firestore Authentication (Google LLC)

Firestore Authentication is a registration and authentication service provided by Google LLC. To simplify the registration and authentication process, Firestore Authentication can make use of third-party identity providers and save the information on its platform.

Personal Data processed: email address; first name; last name; password; phone number.

Place of processing: Ireland – [Privacy Policy](#); Germany – [Privacy Policy](#).

Cookie Policy

This Application uses Trackers. To learn more, the User may consult the [Cookie Policy](#).

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing ("opt-out"),

without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;

- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority

vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilised by the Users

who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: 5 September 2023