

Privacy Policy of P2CAM

Welcome to the privacy policy of P2CAM. This policy will help you understand what data we collect, why we collect it, and what your rights are in relation to it.

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Owner and Data Controller

Pindar Digital Dynamics S.r.l.
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DSA Art. 16 reports: office@pindardigitaldynamics.com
Data protection complaints: Garante per la protezione dei dati personali, Piazza Venezia 11, 00187 Roma — PEC protocollo@pec.gdpd.it — www.gdpd.it

Owner contact email: office@pindardigitaldynamics.com

Type of Data we collect

Among the types of Personal Data that P2CAM collects, by itself or through third parties, there are:

- Trackers
- Usage Data
- device information
- number of sessions
- session duration
- operating systems
- first name
- last name
- email address
- Data communicated while using the service

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 P2CAM.

Unless specified otherwise, all Data requested by P2CAM is mandatory and failure to provide this Data may make it impossible for P2CAM to provide its services. In cases where P2CAM 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 P2CAM or by the owners of third-party services used by P2CAM 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.

Users are responsible for any third-party Personal Data obtained, published or shared through P2CAM.

Mode and place of processing the Data

Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organizational 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 P2CAM (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:

- Managing contacts and sending messages
- Analytics
- Handling payments
- Beta Testing
- Hosting and backend infrastructure
- Traffic optimization and distribution
- User database management

Detailed information on the processing of Personal Data

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.



Google Analytics for Firebase (for apps)

Company: Google LLC

Place of processing: United States

Personal Data processed: device information +5

Beta Testing

This type of service makes it possible to manage User access to P2CAM, 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 P2CAM in a personally identifiable form.



Google Play Beta Testing

Company: Google LLC

Place of processing: United States

Personal Data processed: Data communicated while using the service +2

Handling payments

Unless otherwise specified, P2CAM processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. P2CAM isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.



Stripe

Company: Stripe, Inc.

Place of processing: United States

Personal Data processed: email address +4

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable P2CAM to run and be distributed or to provide a ready-made infrastructure to run specific features or parts of P2CAM.

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.



Amazon S3

Company: Amazon Web Services, Inc.

Place of processing: European Union

Personal Data processed: Usage Data



DigitalOcean

Company: DigitalOcean Inc.

Place of processing: Germany

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

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.



Firebase Cloud Messaging

Company: Google LLC

Place of processing: United States

Personal Data processed: Trackers +1



Brevo email

Company: SendinBlue SAS

Place of processing: France

Personal Data processed: email address +2

Traffic optimization and distribution

This type of service allows P2CAM to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between P2CAM and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.



Cloudflare

Company: Cloudflare, Inc.

Place of processing: United States

Personal Data processed: Trackers +1

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to P2CAM, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build

private profiles that the Owner can display and use for improving P2CAM. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on P2CAM.



Brevo marketing automation

Company: SendinBlue SAS

Place of processing: France

Personal Data processed: email address +2

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Further information about the processing of Personal Data

Sports Video Recording & Sharing

This service allows the recording and sharing of videos of the User's workout sessions. The User can record videos of their training sessions using their device camera.

P2Cam may, in future versions, include AI-assisted movement analysis. In the current version (v1), this processing is not active. All videos are processed solely for archival and on-user-request sharing with the Coach the user selects.

Legal basis: consent of the User, revocable at any time from the "Manage Consent" screen in App Settings.

Personal data collected: camera/video data and usage data.

Coach (allenatore)

Coach (allenatore) — destinatario di video di allenamento e dati di performance quando l'Utente richiede esplicitamente un feedback. I Coach agiscono come titolari autonomi del trattamento per i dati ricevuti.

Data Protection Officer (DPO)

Pindar is not required to designate a DPO under Art. 37 GDPR. The rationale is documented in the internal "DPO Non-Designation" memorandum (WP243 analysis).

Device permissions

The Application requests the following device permissions, each for a specific purpose:

- Camera — recording workout videos.
- Microphone — coach audio commentary on videos.
- Photo Library — read for upload; write to the "p2cam" album.
- Bluetooth — P2Button pairing only (Android manifest uses the "neverForLocation" flag to prevent location derivation).
- Location (when in use) — gym tagging; currently dormant, planned for v1.1.

Iubenda S.r.l. (legal-document hosting)

Iubenda S.r.l. (Italy, EU) hosts the legal documents and, in future, the consent database. Intra-EU processing; no transfer mechanism required. DPA: <https://www.iubenda.com/en/dpa>

Cookie Policy

P2CAM uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

Further Information for Users in the European Union

This section applies to all Users in the European Union, according to the General Data Protection Regulation (the “GDPR”), and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy. Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the Personal Data, if any, and further information about Personal Data can be found in **the section titled “Detailed information on the processing of Personal Data” within this document.**

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.
- 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 fulfil 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 based on the General Data Protection Regulation (GDPR)

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. Such requests are 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 P2CAM 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, P2CAM 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, P2CAM and any third-party services may collect files that record interaction with P2CAM (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 P2CAM 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 P2CAM (or third-party services employed in P2CAM), which can include: the IP addresses or domain names of the computers utilized by the Users who use P2CAM, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized 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 utilized 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 P2CAM 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 P2CAM. The Data Controller, unless otherwise specified, is the Owner of P2CAM.

P2CAM (or this Application)

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

Service

The service provided by P2CAM 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 policy relates solely to P2CAM, if not stated otherwise within this document.

How can we help?

What you can do

Your data

- [Ask us to know and access the information we hold on you](#)

- [Ask us to correct information we hold on you](#)
- [Ask us to be forgotten \(delete the information we hold on you\)](#)
- [Ask to port your data to another service](#)

In case of issues

While we strive to create a positive user experience, we understand that issues may occasionally arise between us and our users. If this is the case, please feel free to contact us.

[Contact us](#)

Footer

P2CAM

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Downloadable documents

- [Privacy Policy](#)
Latest update: June 09, 2026
- [Cookie Policy](#)
Latest update: June 09, 2026
- [Terms and Conditions](#)
Latest update: June 09, 2026

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