

Privacy Policy

The information relating to the processing of your personal data provided or generated in the use of the Smart Mobility application and related services is provided below, pursuant to art. 13 of the General Regulation concerning the protection of individuals with regard to the processing of personal data n. 2016/679 (hereinafter, "GDPR").

This information also takes into account the suggestions of the Working Group art. 29 of Directive 95/46 / EC, in "*Opinion 02/2013 on apps on smart devices*".

Smart Mobility allows employees / collaborators of the Data Controller, upon activation of the related account by the Data Controller, to activate features that facilitate work on the move, allowing them to always be in contact with their employer.

1. Data Controller

The Data Controller of the data necessary for the activation of the Smart Mobility account and for the use of related services, as well as all other information generated in the use of Smart Mobility is your employer.

2. Categories of data processed

It should be noted that the data processed through Smart Mobility could be:

- automatically generated by the device, on the basis of functions predetermined by the developer of the operating system and / or device or by the mobile phone provider (for example geolocation data);
- generated by the user through the app (notes, photos);
- entered by the user when activating the account and filling in forms (name, surname, company email and any other information that may be provided by the same).

3. Purpose of data processing, legal bases and data retention times

WHY ARE YOUR PERSONAL DATA PROCESSED?	WHAT IS THE CONDITION THAT MAKES THE PROCESSING LAWFUL?	HOW LONG DO WE KEEP YOUR PERSONAL DATA?
To allow you to use Smart Mobility and its standard features.	Execution of a contract of which the interested party is a party referred to in art. 6.1, lett. b). Legitimate interest of the Data Controller pursuant to art. 6.1 lett. f) of the GDPR (as regards, for example, the geolocation data processed for the purpose of stamping).	For the time necessary to provide the requested services until Smart Mobility is deactivated and / or for the period provided for by the applicable legislation. In the event of a contractual relationship, the data will be kept for 10 years.
For the fulfilment of any legal obligations (including ensuring the health and safety of workers and third parties in the workplace).	Fulfilment of legal obligations to which the data controller is subject pursuant to art. 6.1 lett. c) of the GDPR.	
For the assessment, exercise or defence of the rights of the owner in court.	Legitimate interest of the Data Controller pursuant to art. 6.1 lett. f) of the GDPR.	For the entire duration of the judicial dispute, until the terms of enforceability of the appeals are exhausted.

Once the storage terms indicated above have elapsed, the data will be destroyed or made anonymous, compatibly with the technical cancellation and backup procedures.

4. Provision of data

Without prejudice to what is indicated in the previous art. 2, the provision of registration data is mandatory to allow you to use Smart Mobility.

5. Categories of data recipients

The data may be disclosed to third parties operating as independent owners, such as public authorities and supervisory and control bodies entitled to request them.

The data will also be processed, on behalf of the Data Controller and therefore as Data Processor, by the company that developed the Smart Mobility app, Gulliver Srl, based in Via Orzinuovi, 73 - 25125 Brescia (BS), to provide maintenance and assistance.

6. Your rights

You can ask the Owner to access the data concerning you and the information referred to in art. 15 of the GDPR, their cancellation in the cases provided for by art. 17 of the GDPR, the correction of inaccurate data, the integration of incomplete data, the limitation of processing in the cases provided for by art. 18 of the GDPR, as well as opposition to processing in the hypothesis of legitimate interest of the owner.

Furthermore, if all the conditions to which the right to data portability are subject, the interested parties have the right to receive the data in a structured format, commonly used and readable by an automatic device, as well as, if technically feasible, to transmit them to another holder without hindrance.

To exercise your rights, you can contact your employer, the Data Controller.

Finally, you can lodge a complaint with the Guarantor for the protection of personal data, as well as resort to other means of protection provided for by the applicable legislation.