

## IMA SENTINEL Privacy Policy

### I. General

We take the protection of your personal data very seriously and will not disclose these and treat them in accordance with statutory data protection regulations, as well as this privacy policy. This privacy policy shall be applicable for all our mobile iPhone and Android apps (hereinafter referred to as "APP"). The nature, purpose and extent of data collection in line with the usage of the APP will be explained. We wish to point out that data transmission on the Internet may have security gaps and the data cannot be completely protected from access by third parties.

### Responsible party

Party responsible for data processing in line with this APP:

I.M.A. INDUSTRIA MACCHINE AUTOMATICHE S.P.A.  
VIA EMILIA 428-442  
40064 OZZANO DELL'EMILIA (BO)  
ITALY  
Phone: +39 051 6514111  
E-mail: [privacy@ima.it](mailto:privacy@ima.it)  
[www.ima.it](http://www.ima.it)

"Responsible party" shall be the party collecting, processing or using personal data (e.g. names, e-mail addresses, etc.).

### Data protection officer

Please contact our data protection officer:

We have appointed a data protection officer for our companies in ITALY:

Alberto Bertuzzo  
Pirola Pennuto Zei & Associati  
Via delle Lame 109  
40122 Bologna  
ITALY  
Phone: +39 051 526711  
E-mail: [dataprotectionit@ima.it](mailto:dataprotectionit@ima.it)

We have appointed a data protection officer for our companies in EUROPE:

Christian Schwinge  
schwinge GmbH  
Am Kochenhof 12  
70192 Stuttgart  
GERMANY  
Phone: +49 (0) 711 / 258560-0  
E-mail: [dataprotectioneu@ima.it](mailto:dataprotectioneu@ima.it)

### General storage time of personal data

Subject to deviating or substantiating data within this privacy policy, the personal data collected with this APP shall be stored until we are requested by you to delete them, you revoke your consent to store data or the purpose of data collection ceases to apply. Provided that there is a legal obligation to keep the data or another legally accepted reason to store the data (e.g. legitimate interest), the relevant personal data shall not be deleted as long as the respective reason for storage remains applicable.

#### I.M.A. Industria Macchine Automatiche S.p.A. Unipersonale



**SEDE LEGALE** (Registered Office):  
Via Emilia 428-442  
40064 Ozzano dell'Emilia (Bologna) • Italy  
Tel. +39 051 6514111 • [www.ima.it](http://www.ima.it)

**SEDE AMMINISTRATIVA** (Administrative Seat):  
Via Tosarelli 184  
40055 Castenaso (Bologna) • Italy  
Tel. +39 051 783111 • Fax +39 051 784422

Cap. Soc. € 22.470.504,68 i.v. • R.E.A. Bo 149288  
Reg. Imprese Bo e C.F. 00307140376  
P.I. 00500931209 • VAT IT00500931209



## Legal bases for the storage of personal data

Personal data shall only be processed when there is an effective legal basis for processing these data. Provided that we process your data, this will be regularly done on the basis of your consent according to Art. 6 (1) lit. a GDPR (e. g. if you voluntarily provide your data on the logon screen or in line with the contact form), for the purpose of contractual performance according to Art. 6 (1) lit. b GDPR (e.g. when using in-APP purchases or fee-based APP functions) or on the basis of legitimate interests according to Art. 6 (1) lit. f GDPR, which will always be balanced with your interests (e.g. in line with promotional activities). The relevant legal basis shall be substantiated separately in the context of this privacy policy.

## Encryption

For security reasons and the protection of the transmission of confidential content, such as the requests you send us as the APP operator, or the communication between APP users, this APP uses encryption. This encryption prevents that data transmitted by you can be read by an unauthorized third party.

## Amendment of this privacy policy

We shall reserve the right to amend these data protection regulations at any time in compliance with statutory requirements.

## II. Your rights

GDPR shall grant data subjects, whose personal data are processed by us certain rights as follows:

### Revocation of consent for data processing

Many processing operations require your consent. Prior to data processing, we will expressly obtain your consent. You shall be entitled to revoke this consent at any time. This can be informally communicated to us by e-mail. The legitimacy of the data processing operations performed until the revocation shall not be affected by the same.

## RIGHT TO OBJECT TO DATA COLLECTION IN SPECIFIC CASES, AS WELL AS TO DIRECT ADVERTISING (ART. 21 GDPR)

AS FAR AS DATA PROCESSING IS BASED ON 6 (1) LIT. E OR F GDPR, YOU SHALL, AT ANY TIME, HAVE THE RIGHT TO OBJECT ON GROUNDS RELATING TO YOUR PARTICULAR SITUATION, TO THE PROCESSING OF THESE PERSONAL DATA; THIS SHALL ALSO APPLY FOR PROFILING BASED ON THESE REGULATIONS. THE RESPECTIVE LEGAL BASE THE PROCESSING IS BASED ON IS CONTAINED IN THIS PRIVACY POLICY. IF YOU OBJECT WE WILL NO LONGER PROCESS THE PERSONAL DATA CONCERNED, UNLESS WE ARE ABLE TO PROVE COMPELLING LEGITIMATE REASONS FOR THE PROCESSING THAT OVERRIDE YOUR INTERESTS, RIGHTS AND FREEDOMS OR THE PROCESSING IS FOR ASSERTING, EXERCISING OR DEFENSE OF LEGAL CLAIMS. WHERE YOUR PERSONAL DATA ARE PROCESSED FOR DIRECT ADVERTISING, YOU SHALL BE ENTITLED TO OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA FOR SUCH ADVERTISING AT ANY TIME; THIS SHALL ALSO APPLY FOR PROFILING, PROVIDED THAT IT IS RELATED TO DIRECT ADVERTISING OF THAT KIND. IF YOU OBJECT, WE WILL THEN NO LONGER USE YOUR PERSONAL DATA FOR DIRECT ADVERTISING.

Muster

### Right to appeal with a supervisory authority

Where GDPR is violated data subjects shall be entitled to appeal to a supervisory authority. The right to appeal shall exist regardless of other administrative or legal remedies.

### Access, erasure and rectification

You shall at any time be entitled to free access to your personal data stored, their source and recipient and the purpose of data processing, or to have these data rectified or erased. Please do not hesitate to contact us in this regard or in case of further queries as to personal data. The related address is in the imprint.

### Right to restriction of processing

**I.M.A. Industria Macchine Automatiche S.p.A. Unipersonale**

**SEDE LEGALE** (Registered Office):

Via Emilia 428-442  
40064 Ozzano dell'Emilia (Bologna) • Italy  
Tel. +39 051 6514111 • www.ima.it

**SEDE AMMINISTRATIVA** (Administrative Seat):

Via Tosarelli 184  
40055 Castenaso (Bologna) • Italy  
Tel. +39 051 783111 • Fax +39 051 784422

Cap. Soc. € 22.470.504,68 i.v. • R.E.A. Bo 149288  
Reg. Imprese Bo e C.F. 00307140376  
P.I. 00500931209 • VAT IT00500931209



You shall have the right to demand restriction of processing your personal data. For this, contact us at any time under the address indicated in the imprint. The right to restriction shall exist where the following applies:

- The accuracy of the personal data stored by us is contested by you. We will normally need some time for verifying the accuracy of the personal data. During the verification period you shall be entitled to demand the restriction of processing your personal data.
- The processing was / is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead.
- When we no longer need your personal data, but they are required by you for the assertion, exercise or defense of legal claims, then you shall be entitled to demand restriction of the use of your personal data instead of their erasure.
- If you have objected according to Art. 21 (1) GDPR, your and our interests must be balanced. As long as it has not been ascertained whose interests override, you shall be entitled to demand the restriction of processing your personal data.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

### Right to data portability

You shall have the right to receive data we automatically process on the basis of your consent or for the performance of a contract in a common, machine-readable format or have these received by a third party. Where you demand direct transfer of the data to another officer this shall only be performed where it is technically feasible.

### III. Access rights of the APP

In order to provide our services via the APP we will need the following access rights which enable us to access certain functions of your device.

- Photos, videos
- Camera (for face ID)

Access to the device functions is necessary to ensure that the APP works properly. The legal basis for this data processing is our legitimate interest in terms of Art. 6 (1) lit. f GDPR, your consent in terms of Art. 6 (1) lit. a GDPR or – where a contract has been concluded – compliance with our contractual obligations (Art. 6 (1) lit. b GDPR). The storage time for data collected this way shall be determined as follows: No face ID data is saved; they are used only when logging in.

### IV. Collection of personal data in line with the use of the APP in general

If you use our APP, we will collect the following personal data:

- E-mail address
- Usage data
- IP address
- Device identification
- Meta data

The processing of these personal data is necessary to ensure that the APP works properly. The legal basis for data processing of this kind is our legitimate interest in terms of Art. 6 (1) lit. f GDPR, your consent in terms of Art. 6 (1) lit. a GDPR or – where a contract has been concluded – compliance with our contractual obligations (Art. 6 (1) lit. b GDPR). The storage time for data collected this way shall be determined as follows: Historicization until we are asked to terminate the service in the Firebase database.

### Inquiry within the APP via e-mail, by phone or telefax

When you contact us (e.g. via the contact form within the app, via e-mail, by phone or telefax), your inquiry including all personal data (e.g. name, inquiry) deriving from it will be stored and processed by us for processing your request.

**I.M.A. Industria Macchine Automatiche S.p.A. Unipersonale**



**SEDE LEGALE** (Registered Office):

Via Emilia 428-442  
40064 Ozzano dell'Emilia (Bologna) • Italy  
Tel. +39 051 6514111 • www.ima.it

**SEDE AMMINISTRATIVA** (Administrative Seat):

Via Tosarelli 184  
40055 Castenaso (Bologna) • Italy  
Tel. +39 051 783111 • Fax +39 051 784422

Cap. Soc. € 22.470.504,68 i.v. • R.E.A. Bo 149288  
Reg. Imprese Bo e C.F. 00307140376  
P.I. 00500931209 • VAT IT00500931209



These data will be processed on the basis of Art. 6 (1) lit. b GDPR, provided that your inquiry relates to the compliance with a contract or is required for the performance of pre-contractual measures. In all other cases the processing is based on your consent (Art. 6 (1) lit. a GDPR) and / or our legitimate interests (Art. 6 (1) lit. f GDPR), since we have a legitimate interest in the effective processing of inquiries addressed to us. The data provided by you via the contact form shall remain with us until we are requested by you to erase them, you revoke your consent to storage or the purpose for data storage no longer applies (e.g. upon completion of your request). Mandatory legal regulations – in particular legal retention periods – shall not be affected. We will not disclose your data without your consent.

### Comment functions on this APP

Along with your comment information as to the time the comment was made and, if you do not post anonymously, the user name chosen by you will be saved for the comments function on this APP. The comments shall be stored on the basis of your consent (Art. 6 (1) lit. a GDPR). The comments and the related data will be stored and remain in the comments section and our servers until the commented content has been entirely erased.

### Newsletter data

If you wish to subscribe to the newsletter offered on our APP, we need your e-mail address, as well as information enabling us to verify that you are the owner of the entered e-mail address and agree to the reception of the newsletter. Further data will not be collected. We will use these data exclusively for sending the requested information and will not disclose them to a third party. The newsletter will be sent on the basis of your consent (Art. 6 (1) lit. a GDPR). **You may revoke this consent at any time.** The data stored with us for obtaining the newsletter will be stored by us until you unsubscribe from the newsletter and erased after un-subscription.

### V. Data analysis

If you access our APP, your behavior can be statistically evaluated by means of certain analysis tools and analyzed for advertising and market research or for improving our offers. When using such tools we will comply with the legal data protection regulations. When external service providers (processors) are employed we will assure by appropriate contracts with the service providers that data processing complies with German and European data protection standards.

### Google Analytics Firebase

We use Google Analytics Firebase (hereinafter referred to as Google Firebase) for analyzing the user behavior. Provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Firebase comprises different functions enabling us to analyze your in-app behavior. Thus we can analyze your screen calls, pressing of buttons, in-app purchases or the efficiency of advertising campaigns. Moreover, we can determine the functions of our APP which are used often or rarely. For this purpose Google Firebase stores the number and duration of sessions, operating systems, device models, region and a series of other data. For a detailed overview of the data collected by Google Firebase go to: <https://support.google.com/firebase/answer/6318039?hl=de> If Google Firebase is used your personal data might be forwarded to the USA. The storage period of data collected this way is regulated as follows: Like the Google Analytics Firebase policies.

Google Firebase is used for optimizing this APP and improving our offers. This is a legitimate interest in terms of Art. 6 (1) lit. f GDPR.

For further information on Google Firebase go to: <https://firebase.google.com/> <https://www.firebase.com/terms/privacy-policy.html>

**Version: February 2021**

#### I.M.A. Industria Macchine Automatiche S.p.A. Unipersonale



##### SEDE LEGALE (Registered Office):

Via Emilia 428-442  
40064 Ozzano dell'Emilia (Bologna) • Italy  
Tel. +39 051 6514111 • [www.ima.it](http://www.ima.it)

##### SEDE AMMINISTRATIVA (Administrative Seat):

Via Tosarelli 184  
40055 Castenaso (Bologna) • Italy  
Tel. +39 051 783111 • Fax +39 051 784422

Cap. Soc. € 22.470.504,68 i.v. • R.E.A. Bo 149288  
Reg. Imprese Bo e C.F. 00307140376  
P.I. 00500931209 • VAT IT00500931209

