DOCUMENT TITLE
CUSTOMER INFORMATION pursuant to article 13 of Regulation (EU) 2016/679

INSTRUCTIONS
This text is made available to each customer who provides personal data to Things Mobile Srl

INFORMATION

pursuant to article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

In accordance with Article 13 of the General Data Protection Regulation - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter "**GDPR**"), we would like to explain how we collect, process, disclose and protect your personal data when you use our Services and our website.

Data controller
The Data Controller is Things Mobile srl, with registered office in Milan (MI), Piazza Luigi di Savoia 22, tax code and Milan Companies Register number: 09882960967 (hereinafter "**Data Controller**" or "**Company**" or "**Things Mobile**" or "**We**").
Data Protection Officer (hereinafter "DPO")
The contact details of the DPO can be found on the Data Controller's website or at the Data Controller's registered office. For the exercise of your rights and for any communication, problem and/or request for clarification regarding the protection of your personal data, you can freely contact the DPO by writing to Things Mobile srl, Piazza Luigi di Savoia 22, 20124 Milano (MI) or you can send us an email to info@thingsmobile.com.

Our principles

Things Mobile is committed to respecting your privacy. Privacy, security and compliance with current laws regarding the protection of personal data are important to us. Everything we do is aimed at ensuring the protection of you and the personal data that concern you.

Scope

Scope	Legal basis of processing
Managing the implementation of pre-contractual measures, as well as managing the implementation and fulfillment of contractual obligations mutually agreed upon. Order management and service provision: - Invoicing/payments and provision of customer care services, sending of service text messages, provision of roaming and interconnection services	(Art. 6(1)(b) GDPR) Fulfillment of a contract
Statistics and credit protection	(Art. 6(1)(c) GDPR) Treatment necessary to fulfill a legal obligation to which the Data Controller is subject (Art. 6(1)(f) GDPR) Processing necessary for the purposes of the legitimate interests pursued by the Data Controller related to the organizational, administrative, financial and accounting management of its organization

Managing the archiving and storage of data, information, communications, including electronic communications and documents relating to the business relationship	(Art. 6(1)(c) GDPR) Treatment necessary to fulfill a legal obligation to which the Data Controller is subject
Commercial and promotional - Direct marketing	(Art. 6(1)(f) GDPR) Processing necessary for the purposes of the legitimate interests pursued by the Data Controller related to the organizational, administrative, financial and accounting management of its organization

Communication of data

Personal data may be disclosed to employees and/or contractors of Things Mobile, appointed as authorized subjects or data processors, and communicated to other subjects or general categories of subjects other than the Data Controller, such as:

Third parties or categories	Scope	Notes
IT companies	Management, maintenance, updating of systems and software used by the Data Controller	Appointment to external data processor (article 28, GDPR). Information at the DPO
Providers of networks, electronic communication services and computer and telecommunication services for archiving, storage and management of data	Hosting, housing, Cloud, SaaS and other remote computer services essential for the rendering of the activities of the Owner; archiving and storage services of electronic documents pursuant to regulations	Appointment to external data processor (article 28, GDPR). Cloud Services may involve data processing in countries outside the EU, which guarantee appropriate confidentiality rights. Information at the DPO
Associates and subsidiaries	Organizational, administrative, financial and accounting management	Appointment to external data processor (article 28, GDPR). Appointment as joint data controllers (article 26, GDPR).
Consultants, professionals, law firms, arbitrators, insurance companies, experts, brokers	Judicial, extra-judicial and insurance activities in the event of accidents Organizational, administrative, financial and	Appointment to external data processor (article 28,

	accounting management	GDPR). Information at the DPO
Banks or institutions, companies and entities of any kind engaged in banking, lending, leasing, factoring, financial - including brokerage - and related, complementary or similar activities	Organizational, administrative, and financial management	
Law Enforcement and Judicial Authorities	Management of investigations by Investigative Bodies in the event of accidents	

Period of data retention

We will keep your information for as long as it is strictly required by law. In the absence of specific legal requirements, the information is kept for the necessary time and within the limits provided for by the regulations in force, including in terms of limitation. More precisely, data are processed according to these data retention terms:

Scope	Data retention terms
Traffic data for service billing purposes	Up to 6 months without prejudice to further retention for dispute management purposes
Investigation and offense prosecution purposes	Traffic and surfing data are stored as required by specific legislation
Administrative, accounting and tax purposes	Up to 10 years after the termination of the service of Things Mobile
Retention under statutory obligation (limitation period for rights)	Up to 10 years after the termination of the service of Things Mobile

Rights

We inform you of the existence of some of your rights on personal data and the related processing that you may request from Things Mobile.

Right	Description	How to make it effective
Right to withdraw consent (Article 13(2)(c) GDPR)	You have the right to withdraw consent for processing operations for which consent is required, without this affecting the lawfulness of the processing operations based on the consent given prior to withdrawal.	*Please send an e-mail to info@thingsmobile.com*
Right of access to data (Article 15, GDPR)	You may request: a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients in third countries or international organizations; d) when possible, the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period; e) the existence of the right to request from the controller rectification or erasure of	*Please send an e-mail to info@thingsmobile.com*

	personal data or restriction of processing concerning the data subject or to object to processing; f) the right to lodge a complaint with a supervisory authority; g) where the data are not collected from the data subject, all available information as to their origin; h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. You have the right to request a copy of the personal data subject to processing	
Right to rectification (Article 16, GDPR)	You have the right to request rectification of incorrect personal data concerning you and to have incomplete personal data completed	*Please send an e-mail to info@thingsmobile.com*
Right to be forgotten (Article 17, GDPR)	You have the right to obtain from the controller the erasure of personal data concerning you if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed	*Please send an e-mail to info@thingsmobile.com*
Right to restriction of processing (Article 18, GDPR).	You have the right to obtain from the data controller the restriction of processing if you have contested the accuracy of personal data (for a period enabling the data controller to verify the accuracy of the personal data) or if the processing is unlawful, but you object to the erasure of personal data and ask instead for its use to be restricted or if they are required by you for the establishment, exercise or defense of legal claims, while the data controller no longer needs them	*Please send an e-mail to info@thingsmobile.com*
Right to data portability (Article 20, GDPR)	You are entitled to receive personal data about yourself which have been provided to us in a structured, commonly used and machine-readable format and you are entitled to transmit these data to another data controller if the processing: (i) based on your consent, (ii) on the contract and (iii) where the processing is carried out by automatic means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, and transmission does not violate the rights of a third party.	*Please send an e-mail to info@thingsmobile.com*
Right to object (Article 21, GDPR)	You have the right to object at any time to the processing of personal data for direct marketing purposes. In this case your data will no longer be processed for this purpose.	*Please send an e-mail to info@thingsmobile.com*
Right to apply to the Authority for the Protection of Personal		

Data		

Voice and data traffic data

The data relating to voice and data traffic shall be processed in accordance with the applicable regulation.

Finally, we inform you that the communication of your personal data is a legal or contractual obligation or a necessary requirement for the conclusion of the contract, so you have the obligation to provide personal data; otherwise it will not be possible to manage the relationship with the Company.