

Revised Privacy Policy for Cyber Smart Device (App Store & Play Store)

Effective Date: 01/08/2024

Cyber Care Srl ("Cyber Care", "we", "us", or "our") respects the privacy of its users ("you" or "your") and is committed to protecting your personal information in accordance with applicable data protection laws, including the Italian Personal Data Protection Code (Legislative Decree No. 196/2003, "Privacy Code" and General Data Protection Regulation 2016/679 "GDPR"). This Privacy Policy ("Policy") explains how we collect, use, disclose, and store your information when you use our chatbot application, **Cyber Smart Device** ("App").

Data Controller

- Name: Cyber Care Srl
- Address: Corso Italia 25, Legnano (MI), Italy
- Email: privacy@cyber-care.it

Information We Collect

We collect the following categories of information when you use the App:

- **Personal Data:**
 - Email Address: Required to create your account and for authentication purposes (fulfillment of contract). We will never share your email address with third parties for marketing purposes.
 - Password: We store your password securely using industry-standard encryption methods (legal obligation).
 - First name: Required to create your account and for authentication purposes (fulfillment of contract) in B2B case. We will never share your first name with third parties for marketing purposes.
 - Last name: Required to create your account and for authentication purposes (fulfillment of contract) in B2B case. We will never share your last name with third parties for marketing purposes.
- **Usage Data:**
 - We collect information about your interactions with the App, including the frequency and duration of your sessions, with your prior consent.

This data is anonymized and used solely for internal analytics to improve the App's functionality and user experience.

- **Technical Data:**

- We collect device type, operating system, and other technical details necessary for the App's functionality and security (legitimate interest). This data is used for troubleshooting purposes and to ensure a smooth user experience.

How We Use Your Information

We use the information we collect for the following purposes:

- To create and manage your user account (fulfillment of contract).
- To provide you with customer support and respond to your inquiries (legitimate interest).
- To analyze anonymized usage data to improve the App and provide a better user experience (with your consent).
- To ensure the security and integrity of the App and protect against unauthorized access (legitimate interest).
- To send you updates, security alerts, and other relevant information about the App, with your prior consent.

Data Sharing and Disclosure

We do not sell or share your personal information with third parties except as described in this Policy.

- **Service Providers:** We may engage trusted third-party service providers to assist us in operating the App and providing services to you. These service providers are contractually obligated to maintain the confidentiality of your information and use it only for the purposes we have specified.
- **Legal Requirements:** We may disclose your information if required by law or in response to a valid legal request from a competent governmental authority (legal obligation).

Data Security

We implement a variety of security measures to maintain the safety of your personal information in accordance with the Privacy Code. Your data is stored in secure environments and protected against unauthorized access, alteration, disclosure, or destruction.

Data Retention

We retain your personal information only for as long as necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law (e.g., tax purposes).

Your Rights

Under the Privacy Code, you have the following rights regarding your personal information:

- **Access:** You have the right to request a copy of the personal information we hold about you.
- **Correction:** You have the right to request that we correct any inaccurate or incomplete personal information.
- **Deletion:** You have the right to request that we delete your personal information, subject to certain exceptions.
- **Restriction:** You have the right to request that we restrict the processing of your personal information.
- **Objection:** You have the right to object to the processing of your personal information.
- **Data Portability:** You have the right to request that we provide you with your personal information in a structured, commonly used, and machine-readable format.

To exercise any of these rights, please contact our Privacy Office at privacy@cyber-care.it.

Changes to This Privacy Policy

We may update this Policy from time to time. We will notify you of any material changes by posting the updated Policy on the App or by sending you an email.

Contact Us

If you have any questions or concerns about this Policy or our data practices, please contact our Privacy Office:

- Email: privacy@cyber-care.it