



Dizme wallet Data protection information

1. Data Controller

eTuitus srl

Via Giovanni Paolo II, 88 - Fisciano (SA)

pec: amministrazione@pec.etuitus.it

2. Information regarding the processing of personal data

As a basic principle, no data is processed by the Data Controller when the wallet is used. All data is stored only on your end device and the Data Controller has no access to this data.

Mediator

However, the wallet is associated with a routing service (“Mediator”), which is operated by the Data Controller.

Incoming messages from Dizme Network Organizations to the User are then encrypted and sent to the Mediator and forwarded by the Mediator to the User's wallet.

Once the messages are successfully delivered to the wallet, the messages are deleted from the Mediator. If the wallet of the user cannot be reached, the messages are stored on the Mediator until they can be delivered to the wallet. Because the messages are encrypted and are decrypted only on the User's end device, the Data Controller has no access to the content of the messages.

Support Requests

In the event of errors or application crashes, the User can submit a support request which contain an error report and additional data such as the date and time of the crash, the model number of the used device, the installed operating system version, the set language and User's country.

In order to handle the support request, the Data Controller processes the user email and the mobile phone.

3. Legal basis of the processing

The legal basis of the processing is that of contractual purposes (Sect. 6 Para. 1 specified in b) GDPR).



Analysis and other analyses are carried out in the legitimate interests of the Data Controller (Sect. 6 Para. 1 specified in f) General Data Protection Regulation - GDPR). These analyses serve to ensure the functionality and/or improvement of the app.

There is no automated decision making.

4. Recipients and recipient categories

With regard to the transfer of data to third parties (recipients apart from the Data Controller), it should be stated that the transfer of data does not take place and is not planned.

However, transfer of data may take place in individual cases where we are legally obligated to do so or the User has provided the consent. This may occur in the following cases:

- Public entities and institutions (e.g. financial authorities, law enforcement agencies, family courts, land registry offices) when legally or officially obligated,
- auditors,
- service providers who we engage within the scope of order processing relationships.

5. Transfer to third countries

Transfers are not made to third countries.

6. Storage duration

We process and store your personal data as long it is required for the fulfilment of our contractual obligations and protection of our rights.

The Wallet is deleted when the app is uninstalled from the User's device.

7. Information regarding the rights of the data subject

As a data subject, the User retains the following rights related to the processing of his or her personal data:

- Right of access (Article 15 GDPR)
- Right to rectification (Article 16 GDPR)
- Right to erasure ("right to be forgotten") (Article 17 GDPR)



- Right to restriction of processing (Article 18 GDPR)
- Right to data portability (Article 20 GDPR)
- Right to object (Article 21 GDPR)
- Right to withdraw consent (Article 7 Para. 3 GDPR)
- Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

To exercise these rights, the User may contact us via the contact information provided under No. 1.

8. Version and changes to this data protection information

This privacy notice was updated in November 2021

Due to technical advancements, changes to the app functionality and/or due to changing legal and/or official requirements, it may become necessary to update this privacy policy. The current privacy policy is available at any time in the app.