Privacy Policy concerning Zucchetti APPs
provided pursuant to art. 13 of the European General Data Protection Regulation 679/2016 (GDPR)

This Privacy Policy is provided exclusively for "Zucchetti" ZClockIn applications but not for any websites through which, for example, the User might access or use the application.

Data Controller
The Data Controller pursuant to art. 4 paragraph 7 of the GDPR is Zucchetti S.p.A. with registered office in Lodi, Via Solferino, 1, 26900 – e-mail ufficio.privacy@zucchetti.it

Data Protection Manager
The Data Protection Manager is Mario Brocca who may be contacted at ufficio.privacy@zucchetti.it

Personal data collected
The services provided by the App, as well as the features and functions of the same do not require any form of User registration. However, we would like to point out that, during their normal operation, the IT systems and software procedures used to operate the App [such as Apple Store, Google Play or Windows Phone Store] acquire certain data referring to the User whose transmission is implicit in the use of the Internet communication protocols, smartphones and devices used. This data category includes, without limitation, the geographical position, phone ID, User contacts, e-mail address and credit card details. The User can consult the Privacy information available on the following websites: Apple http://www.apple.com/legal/privacy/it/ Google play https://www.google.it/intl/it/policies/privacy/ Windows Store: https://privacy.microsoft.com/it-IT/privacystatement/

The ZClockIn app collects the following personal data:
- **Location data** exclusively on entry to the "Virtual Terminal" area for clocking on/off. In the other pages of the app the location is not active. Location data is never saved in the app, but only displayed on the screen and sent to the server when clocking on/off. There is therefore no continuous tracking, but a one-time location identification (which can also be disabled by the user).
- **Camera to take QR code photos** for reading entities associated with clocking on/off or setting an image of your profile. The images are saved in a memory location of the phone not accessible to the user outside the app and can be deleted at any time by the user. Given the need to save the photos, the app requests permission to access the memory.
- **Microphone, contacts and phone**: the functionalities that needed these authorizations have no longer been implemented. For this reason, no data is currently collected for these functions.
- **User name, password and connection URL** necessary to access the functionalities of the app. It also collects and manages the following personal data:
  - personal documents
  - company communications
  - anomalies related to the attendance of the worker and list of request
  - list of the clocking ons/offs made
  - generic data on the employment relationship (date of hiring, division, department, etc.)

Mandatory or optional nature of data provision and consequences of any refusal
The provision of data is optional but necessary to provide the service. Refusal to provide the same will not allow provision of the service or use of the app.

Processing methods
Processing takes place in electronic format and during use of the app the personal data is re-routed through secure connections to the Time & Attendance web software product produced by Zucchetti. The above data is never permanently saved on the device. The user can delete it at any time using the functions present in the app. The data will be processed in Italy.
Personal data retention period
Personal data collected in relation to the methods described above will be retained on the Zucchetti system for the duration of the contractual relationship and for the 14 months following its termination only on backup media. The Data Controller may decide autonomous cancellation policies which, set up within the system as a customized configuration, it will communicate to data subjects.

Personal data processing purposes
The app is used to detect the presence of workers and manage formalities related to expense sheets and business trips, as well as presence/absence justification. Downloading the app is voluntary and at any time the user can uninstall it or change the permissions and authorizations so that personal data such as geolocation is no longer recorded, or delete documents such as expense sheets produced.

Scope of knowledge of your data
The data processed by the app is transmitted to the Time & Attendance software product. The data will be viewable by the Employer according to the authorization profiles assigned by the same in the context of its organization on the applications mentioned above. The service provider is not authorized to view the personal data recorded but only to perform application and system maintenance on the service provided. If there is a need to access your personal data, the provider will request prior authorization from the customer/Data Controller which must promptly inform you of the need and the security measures adopted to protect your data.

Territorial scope of processing
The data provided will be processed in Italy.

Rights of Data Subjects
You may exercise your rights by sending an email to ufficio.privacy@zucchetti.it; in particular, you may request access to personal data concerning you, its correction or cancellation or you may request limitation of processing and may object to processing. You will also have the right to data portability and if you wish to make a complaint you can also submit it to the personal data protection Authority.