



Privacy Policy of the APP for assistance with authentication of genuine Brembo products
pursuant to article 13 Reg (UE) 2016/679 -

Dear User,

Brembo S.p.A. (hereinafter the "**Company**"), in its role of data controller, pursuant to Art. 13 of the European Regulation 679/2016 concerning the protection of personal data (the "**Regulation**"), wishes to provide you with the following information on how your personal data are managed through this App:

1. Types of personal data, purpose of processing, storage period

The Company will process your data in order to install Brembo App for assistance with authentication of genuine Brembo products and to authenticate Brembo products through the App. The legal base of the processing is the performance of a contract to which the data subject is party (letter b) of article 6.1, of the Regulation).

The Company may also process data related to your location - only if you grant your consent according to letter a) of article 6.1, of the Regulation before each scanning of the QR code - in order to allow the Company to prevent the installation of counterfeited products, that could have significant effects on the performance and safety of the brake system, and to identify possible counterfeiting activities. In particular:

Types of personal data	Purpose of processing	Storage period
Your email address	To send you the certificate of authentication of the product	The email address will be deleted within a maximum of 15 days from the delivery of the feedback on the authenticity of the product.
The country where you purchased Brembo product	To receive information about the place where possible counterfeited Brembo products are sold and therefore allow Brembo to plan and implement anti-counterfeiting actions	The time necessary to comply with the above mentioned purposes, in particular, your personal data will be anonymized within 30 days from each single QR code scan. The device localization, if consented, works only during the QR code scanning.
Where device is located (only if you grant your consent)	To record the geographical position while you perform the authentication with the app, in order to map and evaluate the area where eventually the commercialization of counterfeited products is more concentrated (localization lasts only during the scan and then it is deactivated).	
Technical data from your device, collected automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique ID, its IP address, ecc.	To allow you to use the app	

2. Nature of collection and processing methods

The collection of your personal data is a requirement: failing this, it becomes impossible to provide you a feedback on the authentication of the products, except for localization data, which will be processed by the Company only if you allow the Company to do so.

The data shall be processed by those entrusted by the Company with processing, mainly by means of electronic or manual systems and according to the principles of fairness, integrity and transparency that are required by applicable laws on data protection as well as by preserving the privacy of the concerned persons, through the implementation of technical and organizational measures ensuring an adequate safety level (including, without limitation, by preventing access from unauthorized persons - unless such access is required by the applicable laws- or by ensuring restoration of access to data after material or technical accidents).

3. Disclosure, dissemination and transfer of data

Without prejudice to the duty of disclosure in order to fulfil any legal or contractual obligations, the data may be disclosed to legal consultants, to public entities as well as to those persons that are authorized by the laws to receive such data, to Italian or foreign judicial or other public authorities for the fulfilment of legal obligations, including for the purposes of defence before the Courts. Such entities act as independent data controllers.

In order to perform certain services implying the need of personal data processing, the Company may also avail of third parties, including in respect of the service of development, management and hosting of the APP. These companies shall operate as external data processors in compliance with specific and adequate directions concerning the processing methods and safety measures as specified in specific contractual documents. The full and updated list of the companies acting as data processors is available on request to the contacts mentioned below. Data will not be transferred outside the European Union and shall not be disseminated.

4. Rights of Data Subjects

A Data Subject shall have the rights contemplated in the Regulation (articles from 15-21) in respect of the processing of data contemplated thereto, including the right to:

- Obtain confirmation of the existence of personal data concerning him/her and to gain access to them (right of access);
- Obtain the updating, modification and/or rectification of its personal data (right of rectification);
- Obtain erasure, or to set limits to processing, of personal data whose processing is unlawful, including those that are no longer necessary in relation to the purposes for which they were collected or otherwise processed (right to be forgotten and right to the restriction of processing);
- Object to processing (right to object);
- Withdraw previously given consent, if any, without prejudice to the lawfulness of processing based on that consent;
- Receive a copy in electronic form of the data concerning him or her which have been provided to a controller in the framework of an agreement and to have such data transmitted to another controller (right to data portability).

For the exercise of the rights above and in case of further requests for information regarding the present privacy notice, the Data Subject can contact the Data Protection Officer (DPO) by sending an email to privacy.italy@brembo.it or by a registered letter to the legal address of the Company, to the attention of the DPO. Data Subject may also lodge a complaint with the Supervisory Authority in case of infringement of regulations concerning the protection of personal data.

5. Identity and contact details of the Controller and contact of the Data Protection Officer

The Data Controller is Brembo S.p.A., with registered office in Curno (BG), via Brembo n.25 – 24035, phone number 035.6052111, represented by its Legal Representative for the time being.

The Data Protection Officer (DPO) is available at the following e-mail address privacy.italy@brembo.it.