

# Privacy Policy

## 0. Introduction

APINTECH- WT must gather, store and use “personal data” as defined by the European Union Regulation (EU) 2016/679 in order to market our products and services to you. The collection and processing of personal data is subject to restrictions aimed at protecting the privacy of individuals.

This privacy policy document will describe the reasons why personal data is needed, how it will be used, who will be able to access the information and when it will be deleted from our records. It also explains your rights to access your data under data protection laws or seek to have it rectified or deleted. We will at all times comply with the provisions of the European Union General Data Protection Regulations (“GDPR”)

If you choose to use our services, then you agree to the collection and use of information in relation with this policy. The Personal Information that we collect are used mainly for providing and secondarily also for improving the service. **We will under no conditions share your information with any third party, except as described in this privacy policy.**

Please note that **the terms used in this Privacy Policy constitute also the Terms and Conditions for using our APINTECH- WT services.**

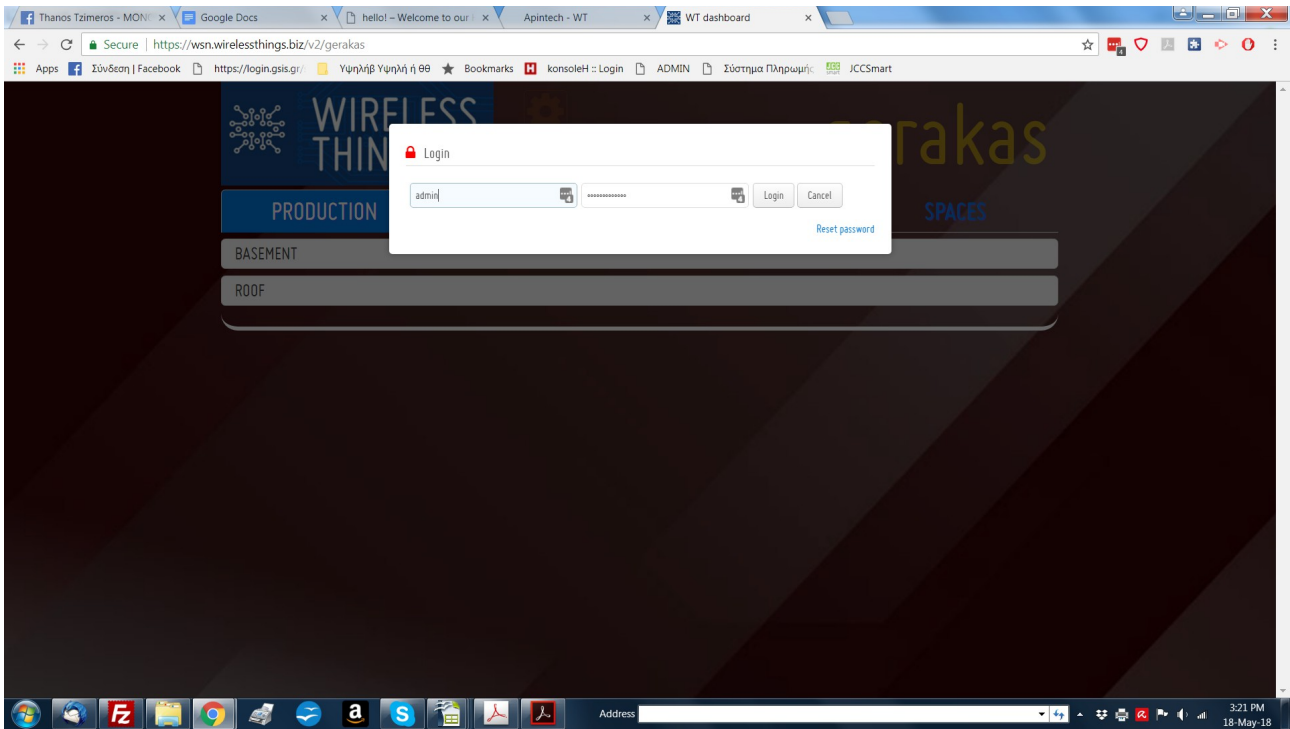
## 1. Data/ Information Collection and Use

### a. Primary user data collection

APINTECH- WT maintains records of users to its WT/ WSN service; while login is required in order to have full access to the WT/ WSN user dashboard portal services it is stressed that registration is not possible via online forms.

The services are always accessible at <https://wsn.wirelessthings.biz/v2/SITENAME> (site-name – the customer user identifier)

Such a portal can only be set up after a contractual agreement with the user. Login is done in a screen as the one below (next page) . Login credentials are set by APINTECH- WT by mail; users can then manage their account.



To register a user the following information will be required:

- [1] **name,**
- [2] **address,**
- [3] **email**

As said, the information is important for your identification and entering the APINTECH- WT portal service as a valid user. This information will be retained by us and used as described in this privacy policy.

**Name [1], address [2] and email [3] information** is stored in our databases (residing with Hetzner, Germany) for the sole reason of allowing your seamless access to the APINTECH- WT Services. This information is not made available to any third party, whatsoever. It is also **not** automatically deleted from our databases. Should you desire to completely erase it from our databases you can send a mail to [info@apintech.com](mailto:info@apintech.com) or use our web site contact form requesting your data to be completely removed from our databases. This request will be executed in one month.

#### **b. User contracts and their impact on user data**

In case a user wishes to terminate his contract, the dashboard service and all related personal data will be eliminated from our servers. No specific request is needed. The user will be asked if he wishes to receive this information as a .sql file. In case no response is provided the data will be erased and no backup will be kept.

In case a user wishes to eliminate only his account but not the service he has to email us at [info@apintech.com](mailto:info@apintech.com)

At this moment in time no other third party interferes with our app and collects data from it. If this changes then the privacy policy will be updated.

#### **c. Secondary user data collection**

APINTECH- WT collects massive sensor data from the user site These data do not in principle

relate to humans although they may do so indirectly. For example our occupancy sensor measures headcount in spaces. Although this is anonymous and non camera based information it can potentially assist deriving information as to some user whereabouts.

In principle all this data is owned by the user. He can request, at any time, to receive them at no cost as a .sql file. Any other format will have to be separately considered and fees may apply. The data will neither be made available to any third party nor automatically erased from our databases as long as there is a contract with the user or his organization. For this to happen, you must explicitly raise the issue by emailing us as above. Upon termination of the contract the procedure described above [b] will apply.

#### **d. Third parties user data collection**

At this moment in time no third parties are in any way intervening with user data.

#### **e. Cookies**

No cookies are currently used by APINTECH- WT to track personal information or for any other reason.

#### **f. User communication**

- APINTECH- WT may send web notifications to the user browser/ mobile, if so required by the particular service. This can be disabled at the mobile level but can also be disabled at from within APINTECH- WT (Push alerts → Block Notifications)
- APINTECH- WT in order to best perform its services may send emails only after you have first registered to it. The deletion of all your related data from our server is possible after an explicit request is sent to [info@apintech.com](mailto:info@apintech.com)
- the APINTECH- WT web site is purely informative, does not collect any data nor will it take any action vis a vis users. Through the web site you may
  - subscribe to a mailing list
  - subscribe to a forum
- From the mailing list/ forum you need to advise us if you wish to be removed from, either of them. Upon your request, as in all cases, your record will be removed.
- APINTECH- WT does not send SMS messages.

## **2. Security**

We value your trust in providing us your personal information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

## **3. Links to Other Sites**

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **4. Childrens' Privacy**

This service does not address anyone under the age of 13. We do not knowingly collect

personal identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

## **5. Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes, indirectly, by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.

## **6. Contact Us**

If you have any questions or suggestions about our privacy policy, do not hesitate to contact us via [info@apintech.com](mailto:info@apintech.com)