

# PRIVACY POLICY

CELLI ASSET MANAGEMENT S.R.L. has created the Acqua Alma Refil APP (hereafter APP) to provide the users (or you) with the services described below (hereafter Services). The users can download the APP entirely free of charge, but the users can make purchases in the APP according to the applicable Terms of Use and Purchase.

## Who we are

CELLI ASSET MANAGEMENT S.R.L., Via Emilia 41, 47921 Rimini (RN) VAT number: IT04520640402 (hereafter Celli or we/us), owner of the APP.

Celli processes the users' personal data (hereafter Personal Data) and is responsible for the acquisition, use, transmission, storage and protection of Personal Data, in conformity with this Privacy Policy and existing legislation (Reg. EU/679, 27 April 2016, General Data Protection Regulations "GDPR" and Legislative Decree 196/2003 as amended by Legislative Decree no. 101 of 10 August 2018– hereafter together Privacy Law). The address below is the contact email to use for any requests for information: [dataprivacy@celligroup.com](mailto:dataprivacy@celligroup.com).

## Information regarding the APP

This page is used to keep users informed of our collection, use and dissemination of Personal Data according to our policies which apply when you decide to make use of our Services.

Choosing to use our Services means accepting the processing of Personal Data set out in this document. We wish to bring to users attention that the Personal Data gathered is used to supply and improve our Services and to the additional purposes listed below.

## The user information gathered, how we use your personal data and for what purposes.

Within the scope of its Services, Celli collects and processes Personal Data according to Privacy Law for the following purposes and based on the relevant legal basis.

1. **Provision of the Minimum Services**, meaning the services that allow the users to (i) create and manage their account; (ii) locate the nearest Celli water distributor; (iii) associate their Smart Bottle with their account through NFC technology; and (iv) obtain water supplies other than those covered by the Purchased Services, as defined below, for instance water supplies obtained through a promo code.

To access the Minimum Services, the users must create their account, alternatively:

- by registering directly on the APP. In this case Celli collects the following Personal Data: users' e-mail and nickname; or
- by logging in the APP via their account registered on third parties' services, such as Twitter, Facebook, Google and Apple. In this case Celli collects the following Personal Data: credentials used by the users to register to the third parties' services (namely, name, surname, nickname and e-mail) and possibly the profile image. However, Celli encourages users to check the pop-up managed directly by the relevant third party where users can verify the Personal Data that such third-party shares with Celli for the above mentioned purposes.

The legal basis for these processing activities is the performance of the contract regulating the Minimum Services and the compliance with legal obligations to which Celli is subject.

The provision of the Personal Data used to create the account – according to the modalities mentioned above – is necessary to pursue the purposes detailed therein, lack of provision of such Personal Data triggers impossibility for Celli to allow the users to create the account and, consequently, to benefit from the Minimum Services.

Please note that the creation of the account is a necessary condition to access any Service within the APP.

2. **Provision of the Wellbeing Services**, meaning an estimate of the suggested amount of water to be consumed each day by the users, which the latter can change at any time as they wish. Moreover, Celli may access Personal Data collected by the Google Fit or Apple Health applications to generate notifications aimed at suggesting hydration, as detailed below.

The above suggestions represent mere advice related to personal wellbeing and must not be understood in any way as intended to direct the users' behaviour to prevent, cure or manage a pathology.

To calculate the suggested amount of daily water Celli collects, with users' prior consent, the following Personal Data: age, weight, gender and physical activity level. In addition, with users' prior consent, Celli may access the number of steps or distance covered registered by Google Fit or Apple Health. Such Personal Data belongs to special categories of Personal Data since they can be used to draw conclusions about the health of the users.

The legal basis for these processing activities is the user's freely given, specific, informed and unambiguous consent. The users have the right to withdraw their consent at any time by contacting Celli at the e-mail: [dataprivacy@celligroup.com](mailto:dataprivacy@celligroup.com). The withdrawal of consent will not affect the lawfulness of processing based on consent before the withdrawal.

The provision of the Personal Data mentioned above is necessary to pursue the purposes detailed therein (*i.e.* for Wellbeing Services exclusively); indeed, lack of provision of such Personal Data triggers impossibility for Celli to provide the Wellbeing Services to the users.

As mentioned above, the creation of the account is a necessary condition to access the Wellbeing Service.

3. **Provision of the Purchased Services**, meaning the performance of the obligations deriving from the contract executed by and between Celli and users allowing the latter to benefit from a certain amount of water supply at the Celli water distributors for a certain period of time at a specific price.

To provide the Purchased Services, Celli collects and processes the following Personal Data: e-mail and nickname of the users. Furthermore, Celli relies on a third party provider to carry out the payment. Such third party collects users' Personal Data (namely, name, surname, credit card number, invoice address and Fiscal Code for invoice purposes) for this purpose and it has been duly appointed by Celli according to the Privacy Law. Celli has no access to the users' credit card data, that are processed exclusively by the third party.

The legal basis for these processing activities is the performance of the contract regulating the Purchased Services and the compliance with legal obligations to which Celli is subject.

The provision of the Personal Data related to the Purchased Services is necessary to pursue the purposes detailed therein, lack of provision of such Personal Data triggers impossibility for Celli to provide the users with the Purchased Services.

4. **Elaboration of statistics through third party**, notably Firebase Analytics, meaning that data on navigation and interaction with the APP are used to produce aggregate statistics only in relation to the APP. To this end, part of the users' IP address is masked and the third party carrying out such processing activity refrains from combining such Personal Data with other data in their possession or communicating it to other third parties.

The legal basis for these processing activities is Celli's legitimate interest to improve the APP and provide the users with services that perform well and meet their needs.

Lack of provision of such Personal Data will not allow Celli to elaborate the above-mentioned statistics through the third party, but it will not affect the provision of the Services mentioned under points 1, 2 and 3 above.

### **Cookies**

Celli does not use cookies in relation to the APP.

### **Sharing of Personal Data**

Celli may make use of third-party firms and staff to facilitate its Services (e.g., Firebase Authentication as identity provider); supply its Services on its behalf (e.g., thirds parties that carry out payments); or help Celli analyse how its Services are used (e.g., Firebase Analytics). These third parties have access to users' Personal Data to carry out tasks on Celli's behalf. They are, in any event, kept informed on how users' Personal Data is to be processed and all Privacy Law constraints on it. Furthermore, personal Data may be communicated to third parties when such communication is mandatory by law, including the prevention/repression of any unlawful activity.

Indeed, Celli shares the Personal Data with third parties involved in the supply chain for the provision of the Services. Celli has duly appointed these third parties where required by the Privacy Law. The users may ask for the list of such third parties from Celli at any time.

### **How is your data safeguarded?**

Celli has put in place all the technical and organisational measures required to safeguard users' Personal Data but it is important to highlight that no internet transmission method or electronic storage can guarantee security totally. Celli's goal is, in any case, to improve IT risk mitigation measures constantly with a view to protecting the Personal Data entrusted to us adequately.

Celli does not transfer Personal Data outside the European Economic Area.

### **Links to other sites**

The APP may contain links to other sites. If you click on this (third party) link you will be directed to the site shown. Remember that these sites are not managed by us. You are thus strongly advised to check the privacy policies of these websites. We have no control over, and can thus take no responsibility for, the contents of these sites, their privacy policies and practices or third party services.

### **Children's privacy**

Whilst the Personal Data gathered and Services supplied do not in themselves put children at risk, Celli has decided not to provide these Services for children under the age of 13. We do not consciously gather Personal Data related to children under 13. If we find out that an under-13 has

supplied us with Personal Data we remove this from our server immediately. If you are a parent or guardian of an under-13-year-old child and you are aware that your child has supplied Personal Data to our server, please contact us so that we can cancel his or her Personal Data.

### **How long can we store your data?**

The Personal Data processed for the provision of the Services detailed above will be retained in accordance with the principle of proportionality and until the purposes of the processing have been pursued, in any case for a period not exceeding 1 year from the users' last login to the APP, except for any further retention for the fulfilment of legal obligations.

### **How can you safeguard your data?**

You can, at any time, exert your rights as regards the data processor in accordance with article 15 and ss of the GDPR, by contacting [dataprivacy@celligroup.com](mailto:dataprivacy@celligroup.com) and:

- obtain confirmation or otherwise of the existence of your Personal Data on our server and its communication in intelligible form;
- obtain information, among others, on a) the purpose of the processing and the methods used for it; b) the categories of Personal Data concerned; c) the recipients or categories of recipient to whom the Personal Data have been or will be disclosed;
- obtain: a) access to the Personal Data processed by Celli; b) the rectification, modification or, where requested, erasure of the Personal Data; c) the portability of the Personal Data; d) under specific conditions, the restriction of the processing;
- under specific conditions, object the processing of Personal Data based on Celli's legitimate interest;
- withdraw your consent at any time in relation to the Wellbeing Services; it will not affect the lawfulness of processing based on such consent before the withdrawal;
- complain to a supervisory authority in the cases or for the purposes covered by the current legislation, namely the Garante per la protezione dei dati personali, Piazza Venezia, n. 11, 00187, Roma, Phone: (+39) 06.696771, e-mail: [protocollo@gpdp.it](mailto:protocollo@gpdp.it).