



Privacy Policy for the Ai-Sun | SunBell App

Pursuant to art. 13 of EU Regulation 2016/679 (General Data Protection Regulation or GDPR)

This Privacy Policy refers to the Ai-Sun | SunBell App exclusively. It may also concern any website through which the User might access or use the App.

Data controller

SUN BELL S.R.L., with registered office at Via I° Maggio 44/46, 25038 Rovato – e-mail info@sunbell.it, is the Data controller, pursuant to art. 4, par. 7, of the GDPR.

Personal data collected

Users are required to register in order to use the App's services, features and functions.

Please be aware that the IT systems and software procedures allowing the App's functioning (e.g. Apple Store or Google Play) acquire, during standard operation, certain data which may refer to the User. The use of internet communication protocols, smartphones and devices implies the transmission of said data. This category of data includes, but is not limited to, the User's geographical position, telephone identity, contacts, e-mail and credit card details. The User may consult the Privacy information available on the following websites:

Apple <https://www.apple.com/legal/privacy/>

Google Play <https://policies.google.com/privacy?hl=en&gl=it>

The Ai-Sun | SunBell App collects the following personal data:

GPS geolocation

The Ai-Sun | SunBell App may interact, subject to prior express consent, with the GPS (Global Positioning System) function integrated into the device (smartphone or tablet).

The Ai-Sun | SunBell App does not require said function to be activated in order to work; however, this makes location easier upon the first installation in order to be able to automatically establish the sunrise/sunset times to be used to manage scheduled blind opening/closing. There is no continuous tracking, only detection at specific times (this function can be deactivated by the User).



Managing account registration requests

SUNBELL SRL manages personal data connected with AI SUN | SUNBELL account registration requests by processing identification details, such as name, customer ID number, mobile phone, e-mail and registration number. Personal data processing is necessary for SUNBELL SRL to fulfil its obligations towards the User in accordance with the Terms of service.

Mandatory/optional nature of the data supply and consequences of a refusal

Data supply is optional. However, data are necessary for the provision of the service. Refusal to provide data shall prevent the provision of the service and use of the App.

Methods of processing

Processing takes place electronically. During the use of the App, personal data are redirected to the SUNBELL data centre through secure HTTPS connections within an encrypted connection. The above-mentioned data are never permanently saved on the device. The User may remove them at any time by using the App's functions.

The data shall not be transferred to third countries.

Personal data retention

SUNBELL SRL hereby confirms that the processing of all data collected during the use of the App and the registration of third-party users shall be made in accordance with EU Regulation 2016/679 (GDPR). In fact, the App was developed according to the principle of "privacy by design". Based on the state of the art, the nature, scope, context and purposes of the processing, as well as its risks, which involve different levels of probability and seriousness for the rights and liberties of natural persons, the Data controller, SUNBELL SRL, maintains appropriate technical and organisational measures, both upon establishment of the processing means and during the processing itself. Such measures, which include pseudonymisation, aim at implementing the principles of data protection (e.g. the minimisation principle) effectively. The Data controller also integrates the processing with the necessary guarantees in order to comply with the provisions of EU Regulation 2016/679 (GDPR) and protect the rights of the software users involved.

Personal data shall be stored until the person concerned objects to their processing or requests their removal.

Rights of the person concerned



The person concerned may exercise his/her rights as per art. 15, 16, 17 and 21 of EU Regulation 2016/679 by addressing the Data controller, Sunbell Srl.

The person concerned may obtain confirmation about the existence of personal data about him/her, even when these have not yet been registered, and may obtain their notification in an intelligible form.

The person concerned has the right to be informed about:

- a) the origin of the personal data;
- b) the purposes and methods of processing;
- c) the logic behind the processing of data by electronic means;
- d) the identification details of the Data controller, processors and designated representative;
- e) the subjects or subject categories to whom personal data may be communicated or who might get to know said data in their capacity as designated representative on the national territory, processors or parties in charge.

The person concerned has the right to:

- a) have personal data updated, corrected or integrated, when necessary;
- b) have personal data removed, made anonymous or blocked, when the data are processed against the law, including data that do not need to be stored for the purposes for which they were collected or processed;
- c) receive confirmation that the operations under letters a) and b), including their content, have been notified to the people to whom the data were communicated or transmitted, except when such notification is impossible or requires the use of means that are disproportionate compared to the right to be protected.

The person concerned has the right to object to, partially or fully:

- a) the processing of personal data about him/her on legitimate grounds, even when the data are relevant to the purposes of the data collection;
- b) the processing of personal data about him/her for the purposes of sending advertising or direct marketing material or carrying out market research or promotion.

In order to exercise his/her rights under art. 15, 16, 17 and 21 of EU Regulation 2016/679, the person concerned shall send an e-mail to info@sunbell.it, for the attention of the Data controller. In particular, he/she may request access to, the correction or removal of his/her personal data or may limit or object to their processing. He/she also has the right to data portability and may lodge a complaint to the Data Protection Authority.