

Privacy Policy

Last updated: 18 May 2026

This policy describes how **UNDERWATER CARE S.R.L.S.** collects, uses and protects the personal data of users who use the website, the KFLOW platform and related services.

This policy is drafted pursuant to Articles 13 and 14 of **Regulation (EU) 2016/679 (GDPR)**.

1. Data Controller

The controller of personal data is:

UNDERWATER CARE S.R.L.S.

Via Umberto I, 9

62024 Matelica (MC) – Italy

VAT No. 02088910431

Email: privacy@underwatercare.it

For any request regarding the processing of personal data or to exercise the rights provided for by the GDPR, you may contact the controller at the above details.

2. Types of Data Processed

Browsing data

When browsing the website, some data is automatically collected by the IT systems that enable the service to function.

This data may include:

- IP address
- type of browser used
- operating system
- information on pages visited
- referring URL
- technical data collected via cookies or similar technologies.

This information is used primarily to ensure the correct functioning of the website and for aggregate statistical analysis.

Data voluntarily provided by the user

When the user contacts Underwater Care via a contact form, email or newsletter subscription, certain personal data necessary to handle the request may be collected.

This data may include:

- first and last name
- email address
- phone number
- company affiliation
- city of residence
- tax or billing data (in the event of purchase of services)

- any further information communicated voluntarily.

Data processed for contractual purposes

In the event of purchase or use of the services offered by Underwater Care, the data necessary for managing the contractual, administrative, accounting and tax relationship may be processed.

Data processed for marketing purposes

With the user's consent, Underwater Care may use certain personal data (such as name and email) to send:

- newsletters
- promotional communications
- updates on products or services
- invitations to events or webinars.

Consent may be withdrawn at any time.

3. Use of the KFLOW Platform

To use the platform, it is necessary to create an account by entering an email address. No further personal data is required.

During use of the platform, technical and operational data relating to the use of the application and training sessions may be recorded.

This data may include information such as:

- type of device used
- version of operating system or firmware
- app features used
- data synchronisation with the platform.

This information is used exclusively to improve the functioning of the app and ensure service stability.

The account and related data can be deleted both from the application and from the platform.

4. Synchronisation with the EarOn PRO App

The KFLOW platform can synchronise data with the EarOn PRO app, a mobile application that allows users to monitor training activities and analyse their activities.

Synchronisation may include data such as:

- user profile information
- account settings
- operational data relating to training
- information on devices used.

Data transmission takes place via secure connections with encryption protocols (HTTPS/TLS).

5. Purposes of Processing and Legal Bases

Personal data is processed for various purposes, on the basis of the conditions set out in Article 6 of the GDPR.

In particular, data may be used to:

- provide and manage website and platform services
- perform a contract or pre-contractual measures requested by the user
- manage synchronisation between the app and the web platform
- ensure system security and prevent fraudulent use
- comply with legal obligations
- send promotional communications and newsletters, subject to consent
- carry out aggregate statistical analyses on the use of services.

Where processing is based on the legitimate interest of the controller, the user has the right to object at any time.

6. Processing Methods and Security

Personal data is processed using IT and electronic tools, in compliance with the principles of lawfulness, fairness and transparency provided for by the GDPR.

To protect the data, appropriate security measures are adopted, including:

- encryption of data during transmission
- authentication and access control systems
- system access logging
- data backup and recovery procedures
- protection of web applications via dedicated security systems.

7. External Data Processors

For the provision of services, Underwater Care may engage external suppliers who process personal data on behalf of the controller.

These parties act as Data Processors pursuant to Art. 28 GDPR and are bound by specific contractual agreements.

The main categories of suppliers used include:

- hosting and cloud infrastructure services
- email management and communications services
- statistical analysis tools
- push notification systems for mobile applications
- online payment services (where applicable)
- billing and accounting management software
- customer support management systems.

The updated list of Data Processors may be requested from the Controller.

8. Joint Controllership

For certain features involving data synchronisation between the KFLOW platform and the EarOn PRO app, **UNDERWATER CARE S.R.L.S.** and **UBA PROJECT S.R.L.S.** act as **joint controllers** pursuant to Article 26 of the GDPR.

The two companies jointly determine the purposes and means of processing the data necessary for the operation of the integrated services.

The user may exercise their rights against either controller. The main point of contact for data subjects is:

privacy@ubaproject.com

9. Transfer of Data to Non-EU Countries

Should external suppliers or the joint controller referred to in the preceding sections process data in countries outside the EEA, the Controller ensures that the transfer takes place in compliance with Chapter V of the GDPR, by means of:

- European Commission adequacy decision (Art. 45 GDPR);
- Standard Contractual Clauses (SCC) — June 2021 version (Art. 46(2)(c) GDPR);
- Other appropriate safeguards pursuant to Art. 46 GDPR.

10. Data Retention

Personal data is stored for the period strictly necessary to achieve the purposes for which it was collected.

In particular:

- contact data is retained for the time necessary to handle the user's request
- contractual and billing data is retained for the period required by tax legislation (generally 10 years)
- data used for marketing purposes is retained until consent is withdrawn
- technical and statistical data is retained for limited periods proportionate to the analytical purposes.

11. Cookies and Tracking Technologies

The website uses cookies and similar technologies to ensure the correct functioning of services and improve the browsing experience.

Cookies may be used to:

- store user preferences
- analyse website traffic
- improve service security
- provide personalised content.

Technical cookies necessary for the functioning of the website do not require the user's consent. Other cookies, such as third-party analytics or marketing cookies, are only used with prior consent via the cookie banner.

For more information, please consult the **Cookie Policy** available on the website.

12. Rights of Data Subjects

Users have the right to exercise at any time the rights provided for by the GDPR, including:

- right of access to their personal data

- right to rectification of inaccurate data
- right to erasure of data in cases provided for by law
- right to restriction of processing
- right to data portability
- right to object to processing
- right to withdraw consent at any time.

To exercise your rights, please write to:

privacy@underwatercare.it

13. Complaint to the Supervisory Authority

If the user considers that the processing of their data violates data protection legislation, they have the right to lodge a complaint with the competent supervisory authority.

Italian Data Protection Authority (Garante per la protezione dei dati personali)

Piazza Venezia 11 – 00187 Rome

www.garanteprivacy.it

14. Updates to the Privacy Policy

This policy may be updated over time to reflect regulatory changes or changes in the services offered.

The updated version will always be available on this page with the date of the last update.