

PRIVACY POLICY MOSAICO

Last updated: 20/05/2026

Welcome to MOSAICO.

This Privacy Policy explains how Digita SRL collects, uses, stores, shares and protects personal data when you visit the MOSAICO website, use the MOSAICO web platform or mobile applications, create or access an account, contact us, request information, receive support, or otherwise interact with MOSAICO.

MOSAICO is designed for business, professional and industrial use. It is not intended for consumer use. This Privacy Policy applies where Digita SRL acts as an independent data controller, including in relation to website visitors, account users, authorised users, support contacts, billing contacts, app users, commercial contacts and individuals who interact with MOSAICO.

This Privacy Policy does not apply to personal data that Digita SRL processes on behalf of a customer organisation within Customer Data, Industrial Data, plant data, logs, reports, dashboards, operator feedback, support data, alarms, events, notifications, technical documentation or other information processed through MOSAICO. In those cases, the customer organisation is generally the data controller and Digita SRL acts as processor under the applicable Data Processing Addendum.

MOSAICO does not currently use third-party analytics SDKs such as Firebase Analytics, Mixpanel, Amplitude or similar tools, based on the current technical configuration of the Service.

MOSAICO may, however, collect and process internal operational analytics, usage metrics, activity logs, technical logs, access logs, application logs, support logs, last activity timestamps and service performance data for the purposes of service administration, monitoring, security, support, billing, performance analysis, maintenance and improvement of the Service.

1. Who Collects Your Data?

The data controller is:

Digita SRL
Via Verdi 3
24121 Bergamo, Italy
VAT / Tax Code: 04334180165
Company identification number: IT04334180165
Share capital fully paid in: €10,000.00
PEC: pec.digita@legalmail.it
Email: info@digita.work

For privacy-related questions or to exercise your data protection rights, you may contact us at:

info@digita.work

or by writing to:

Digita SRL
Via Verdi 3
24121 Bergamo, Italy
Attention: Privacy

2. Scope of This Privacy Policy

This Privacy Policy applies to personal data processed by Digita SRL as controller in connection with:

- (a) the MOSAICO website;
- (b) the MOSAICO web platform;
- (c) the MOSAICO mobile applications for iOS and Android, including Mi-Report, Mi-Live, Mi-Add, Mi-Core, Mi-Tag, Thunder & Sfera;
- (d) account administration and authorised user management;
- (e) demo requests, contact forms and commercial enquiries;
- (f) customer support, technical assistance and remote support coordination;

- (g) billing, contracts, offers, order forms and administrative activities;
- (h) security, abuse prevention and service integrity;
- (i) communications, including service communications and marketing where applicable;
- (j) legal compliance and dispute management.

Where you use MOSAICO as an authorised user of a customer organisation, that organisation may separately process your personal data as an independent controller. You should refer to that organisation's privacy notice for information about how it processes your personal data.

Where Digita SRL processes personal data on behalf of a customer organisation through MOSAICO, such processing is governed by the applicable customer agreement and Data Processing Addendum.

3. What Personal Data We Collect

3.1 Data You Provide Directly to Us

We may collect the following categories of personal data directly from you:

- (a) Identity data, such as first name, last name, role, job title, organisation, department, plant or site affiliation;
- (b) Contact data, such as business email address, phone number, postal address or PEC address;
- (c) Account data, such as username, account ID, login credentials, authentication information, role and permissions;
- (d) Contract and customer data, such as organisation name, order information, contract details, customer type, authorised user status, plant or site reference and service scope;
- (e) Billing and administrative data, such as billing address, VAT number, tax information, invoice data, payment status and transaction references;
- (f) Support data, such as messages, requests, tickets, bug reports, screenshots, technical descriptions, logs, diagnostic information and communications with our support team;
- (g) Marketing and communication data, such as newsletter preferences, contact preferences and responses to communications;
- (h) Feedback data, such as comments, suggestions, ratings, corrections, feature requests or other feedback about MOSAICO.

3.2 Data Generated When You Use MOSAICO

When you use the website, web platform or mobile applications, we may collect certain technical, operational and usage data, including:

- (a) Technical data, such as IP address, device type, operating system, browser type, app version, language settings, session identifiers, access times, network information and error or crash information;
- (b) Usage data, such as features used, actions performed, dashboards viewed, reports accessed, notifications received, feedback submitted, session activity and other operational metrics generated through the use of MOSAICO;
- (c) Security and activity data, such as authentication events, access logs, failed login attempts, activity logs, last activity timestamps, suspicious activity signals, audit logs and system events;
- (d) Account and organisation activity data, such as information relating to when a user is added to an organisation, assigned a role, granted access to a module, removed from a project or otherwise granted or modified access;
- (e) Mobile application data, such as app version, device operating system, technical identifiers, crash information, push notification settings and interaction with MOSAICO mobile applications;
- (f) Support and maintenance data, such as diagnostic information, technical logs, database records, remote support information and information required to troubleshoot, maintain or secure the Service.

As of the date of this Privacy Policy, MOSAICO does not currently use third-party analytics SDKs such as Firebase Analytics, Mixpanel, Amplitude or similar tools. Usage analytics are generated and managed internally for operational, administrative, security, support and service improvement purposes.

3.3 Data Processed Through MOSAICO as Part of the Service

Depending on how a customer organisation configures and uses MOSAICO, the Service may process Industrial Data, plant data, alarms, events, reports, dashboards, operator feedback, notifications, logs, QR code equipment pages, technical documentation, maintenance information, access records and operational history.

Where such data includes personal data and is processed by Digita SRL on behalf of a customer organisation, it is governed by the applicable customer agreement and Data Processing Addendum, not by this Privacy Policy, except where Digita SRL also processes certain related data as controller for security, account administration, support, legal compliance or service integrity.

Most data processed through MOSAICO is industrial or technical data relating to plants, machines, assets, processes and operations. Such data is not necessarily personal data unless it relates to an identified or identifiable individual.

3.4 Mi-BOX, Local Infrastructure and Remote Support Data

Where MOSAICO includes Mi-BOX, local infrastructure, remote support, hosting, database maintenance, cybersecurity services or OT-related services, Digita SRL may process limited personal data in connection with installation, configuration, maintenance, diagnostics, support and security. This may include technical contact data, account data, access logs, support logs, system logs, network-related data, device information, user roles, permissions, authentication data and other information necessary to operate, secure and support MOSAICO.

Where such data is processed on behalf of the customer organisation, the Data Processing Addendum applies.

4. Why We Use Your Personal Data and Legal Bases

We process personal data for the purposes and legal bases described below.

4.1 To Provide and Maintain MOSAICO

We use identity data, account data, technical data, usage data, support data and security data to provide, operate, maintain and make available MOSAICO.

Legal basis:

Performance of a contract or steps prior to entering into a contract; legitimate interest in providing and maintaining a secure and functional service.

4.2 To Create and Manage Accounts

We use identity data, contact data, account data and organisation data to create accounts, authenticate users, manage access permissions, administer user roles and enable access to MOSAICO modules and mobile applications.

Legal basis:

Performance of a contract; legitimate interest in account administration and access control.

4.3 To Provide Customer Support, Maintenance and Technical Assistance

We use identity data, contact data, account data, support data, technical data and, where necessary, limited service data to respond to support requests, investigate issues, debug problems, maintain applications, improve service reliability and coordinate technical assistance.

Where necessary, this may include the processing of logs, diagnostic information, screenshots, technical descriptions, database records or limited Customer Data required to troubleshoot a specific issue.

Legal basis:

Performance of a contract; legitimate interest in providing support, maintaining MOSAICO and improving the Service.

4.4 To Manage Security, Abuse Prevention and Service Integrity

We use account data, technical data, usage data, security data and logs to protect MOSAICO, prevent fraud, detect unauthorised access, investigate abuse, enforce terms, maintain service integrity and support cybersecurity measures.

Legal basis:

Legitimate interest in protecting MOSAICO, customers, users, systems and data; legal obligation where applicable.

4.5 To Support OT Cybersecurity and NIS2-Oriented Services

Where applicable, we may process technical contact data, access logs, system logs, network-related data, event records, support information and cybersecurity-related information to support OT cybersecurity services, NIS2 readiness, SCUDO OT services, monitoring, vulnerability management, backup and disaster recovery support, and related industrial cybersecurity activities.

Legal basis:

Performance of a contract; legitimate interest in protecting systems, networks, services and industrial digital environments; legal obligation where applicable.

4.6 To Manage Contracts, Billing and Administration

We use identity data, contact data, contract data, billing data, payment status and administrative information to manage offers, order forms, contracts, invoices, accounting, tax obligations and payment-related activities.

Legal basis:

Performance of a contract; compliance with legal obligations; legitimate interest in business administration.

4.7 To Communicate With You

We use contact data, account data and organisation-related information to send operational, administrative and service-related communications.

These communications may include, by way of example:

- (a) account creation or invitation emails;
- (b) notifications that you have been added to an organisation, project, plant, module or mobile application;
- (c) access, role or permission-related communications;
- (d) service, security or support communications;
- (e) important notices relating to changes to MOSAICO, these Terms, the Privacy Policy, the Cookie Policy or other legal documents;
- (f) technical communications relating to maintenance, updates, downtime, security, remote support, Mi-BOX or related services.

Legal basis:

Performance of a contract; legitimate interest in administering the Service and communicating operational information; legal obligation where applicable.

4.8 Marketing Communications

MOSAICO does not currently send marketing or promotional communications to authorised users of customer organisations, unless such communications are separately requested or permitted by applicable law.

If Digita SRL decides to send marketing communications in the future, such communications will be sent only where permitted by applicable law and, where required, with the user's prior consent. Users will be able to unsubscribe or object to marketing communications at any time.

4.9 To Monitor, Analyse and Improve MOSAICO

We may use technical data, operational data, usage data, feedback trends, activity logs, access logs, performance data and aggregated or anonymised statistics to:

- (a) monitor the use, performance and availability of MOSAICO;
- (b) analyse usage trends and service performance;
- (c) provide internal analytics dashboards to authorised administrators;
- (d) identify bugs, errors, misuse, abuse or abnormal activity;
- (e) improve the reliability, security, performance and functionality of MOSAICO;
- (f) develop, test and improve features, mobile applications, dashboards, reports, notifications, interfaces and user experience.

Legal basis:

Legitimate interest in monitoring, securing, maintaining and improving MOSAICO; performance of a contract where such processing is necessary to provide the Service.

For clarity, Digita SRL does not use Customer Personal Data to train general-purpose artificial intelligence models by default, unless expressly agreed in writing or clearly disclosed in a specific feature or agreement.

4.10 To Comply With Legal Obligations

We may process personal data to comply with tax, accounting, regulatory, legal, data protection, court or authority obligations.

Legal basis:

Compliance with legal obligations.

4.11 To Establish, Exercise or Defend Legal Claims

We may process personal data where necessary to prevent, investigate or manage disputes, enforce agreements, recover unpaid amounts, protect rights or defend legal claims.

Legal basis:

Legitimate interest in protecting our legal rights; legal obligation where applicable.

5. Cookies and Similar Technologies

When you visit the MOSAICO website or use the Service, we may use cookies or similar technologies that are necessary for the functioning, security, authentication, session management, language management, service continuity and accessibility of the website or Service.

As of the date of this Privacy Policy, MOSAICO does not currently use third-party analytics SDKs such as Firebase Analytics, Mixpanel, Amplitude or similar tools.

If Digita SRL introduces non-essential cookies, third-party analytics tools, marketing cookies or similar tracking technologies in the future, such tools will be used only where permitted by applicable law and, where required, with your prior consent.

For more information, please see our Cookie Policy, where applicable.

6. How Long We Keep Your Personal Data

We keep personal data only for as long as necessary for the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by law.

Indicative retention periods are:

- (a) Account data: for the duration of the account and for up to 1 year after account deletion, unless longer retention is required for security, legal or dispute purposes;
- (b) Contract and customer relationship data: for the duration of the contractual relationship and for up to 10 years where required for accounting, tax or legal purposes;
- (c) Invoices and accounting records: for 10 years from the relevant financial year, where required by applicable law;
- (d) Support requests: for the time necessary to handle the request and for up to 5 years for record-keeping, service improvement and dispute management;
- (e) Technical, security, usage and activity logs, including access logs, application logs, service logs, last activity timestamps and internal operational analytics: for up to 12 months, unless a longer retention period is necessary for security, abuse prevention, billing verification, legal compliance, dispute management, cybersecurity or service integrity;
- (f) Demo and sales lead data: for up to 3 years from the last meaningful interaction, unless a contractual relationship is established or you object earlier;
- (g) Privacy rights requests: for the time necessary to respond and for up to 5 years to demonstrate compliance;
- (h) Dispute-related data: for the duration of the dispute and until the expiry of applicable limitation periods.

Where Digita SRL processes personal data on behalf of a customer organisation, retention is governed by the applicable customer agreement, Data Processing Addendum, customer configuration, deletion policy and backup retention rules.

Where Personal Data is stored locally on Mi-BOX or on Customer-controlled infrastructure, retention may also depend on the applicable Order Form, technical configuration, local backup settings and the Customer's instructions.

7. Who We Share Personal Data With

We may share personal data on a need-to-know basis with the following categories of recipients:

- (a) authorised Digita SRL personnel and contractors;
- (b) hosting, infrastructure, database, storage and backup providers;
- (c) code repository, development workflow, website management and technical operations providers;
- (d) IT support, database maintenance and development providers;
- (e) cybersecurity, OT security, monitoring and NIS2-readiness partners;
- (f) HMI, mobile application, debugging, development and maintenance partners;
- (g) payment and billing providers, if and when enabled;
- (h) professional advisers, such as lawyers, accountants, auditors and consultants;
- (i) banks and financial institutions, where necessary;
- (j) public authorities, courts, regulators or law enforcement bodies where required by law;
- (k) business partners or successors in the context of mergers, acquisitions, reorganisations or business transfers, where applicable.

Our current main service providers and subprocessors include:

- (a) GitLab, for website management, code repository management, versioning, development workflow, project management and technical operations related to MOSAICO;

(b) SYSWARE, for hosting, IT infrastructure support, database maintenance, database development, system administration, technical operations, support and related services connected with MOSAICO;

(c) AEGIS OT, for OT cybersecurity services, cybersecurity assessment, NIS2 readiness support, SCUDO OT services, monitoring, resilience support, backup and disaster recovery support, vulnerability management, access and event logging, cybersecurity maintenance and related industrial cybersecurity activities;

(d) DWYT, for development, debugging and maintenance of the MOSAICO Suite, including HMI development, user interface development, mobile application development and maintenance, performance optimisation, application compatibility, debugging, technical support and related development activities.

As of the date of this Privacy Policy, MOSAICO does not currently use OpenAI, AWS or Stripe as subprocessors for the MOSAICO services described in this Privacy Policy, unless otherwise stated in a specific agreement, Order Form, Data Processing Addendum or updated subprocessor list.

As of the date of this Privacy Policy, MOSAICO does not currently use third-party analytics SDKs such as Firebase Analytics, Mixpanel, Amplitude or similar tools.

8. International Transfers

We aim to use providers and configurations that are appropriate for the protection of personal data, including providers located in or offering services within the European Union where possible.

As of the date of this Privacy Policy, the main processing locations for MOSAICO service providers and subprocessors are located in Italy or within the European Union, except for GitLab, which may involve processing or access from the United States and/or other locations according to GitLab's applicable service configuration and transfer mechanisms.

Based on the information currently available to Digita SRL, SYSWARE stores and manages data at its premises in Grassobbio, Italy, and not in a public cloud environment, unless otherwise agreed in writing or specified in the applicable Order Form or technical documentation.

Digita SRL does not intentionally transfer Customer Personal Data outside the European Economic Area in connection with MOSAICO, except where such transfer is necessary for the use of GitLab or another duly authorised service provider, or where otherwise required by the Customer, the Agreement, applicable law or the technical configuration of the Services.

Where personal data is transferred internationally, we rely on appropriate safeguards under applicable data protection laws, such as adequacy decisions, Standard Contractual Clauses, the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, the Swiss-U.S. Data Privacy Framework, supplementary measures or other lawful transfer mechanisms.

For GitLab, transfers may rely on the Data Privacy Framework, Standard Contractual Clauses or other applicable safeguards according to GitLab's data processing terms.

9. Security

We implement appropriate technical and organisational measures designed to protect personal data against unauthorised access, accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

These measures may include access controls, authentication, role-based permissions, encryption in transit where appropriate, secure communication protocols, VPN or TLS connections where applicable, confidentiality obligations, backup procedures, logging, monitoring, incident response processes and subprocessor management. Where MOSAICO includes Mi-BOX, OT infrastructure, remote support or cybersecurity-related services, measures may also include network segmentation, controlled remote access, firewall or gateway configurations, logging, backup or disaster recovery functions, vulnerability management and coordination with authorised IT/OT cybersecurity partners, according to the applicable technical configuration.

No online, cloud, industrial or remote support service can be guaranteed to be completely secure. You are responsible for keeping your credentials confidential, using secure devices, complying with your organisation's IT/OT security procedures and promptly notifying us or your organisation of any suspected unauthorised access.

10. Your Data Protection Rights

Depending on applicable law and the circumstances, you may have the following rights:

- (a) right of access: to obtain confirmation whether we process your personal data and receive a copy of it;
- (b) right to rectification: to request correction of inaccurate or incomplete data;
- (c) right to erasure: to request deletion of your personal data;
- (d) right to restriction: to request restriction of processing;
- (e) right to portability: to receive personal data you provided to us in a structured, commonly used and machine-readable format, where applicable;
- (f) right to object: to object to processing based on legitimate interests or direct marketing;
- (g) right to withdraw consent: where processing is based on consent;
- (h) right not to be subject to solely automated decisions producing legal or similarly significant effects, where applicable;
- (i) right to lodge a complaint with a supervisory authority.

To exercise your rights, contact us at:

info@digita.work

We may need to verify your identity before responding. If your request relates to personal data processed by us on behalf of a customer organisation, we may direct you to that organisation or cooperate with it in accordance with the applicable Data Processing Addendum.

You also have the right to lodge a complaint with the competent supervisory authority. In Italy, this is the Garante per la protezione dei dati personali.

11. Automated Decision-Making

Digita SRL does not use personal data covered by this Privacy Policy to make decisions based solely on automated processing that produce legal effects or similarly significant effects on individuals.

MOSAICO may provide dashboards, reports, notifications, alerts, anomaly detection, predictive indicators, operational views or AI-assisted digital operator functionalities. These tools are intended to support industrial monitoring, awareness, analysis and decision-making, but they should be reviewed and evaluated by authorised users and, where applicable, by the relevant customer organisation before being relied upon.

The customer organisation remains responsible for operational, employment, safety, cybersecurity, production, maintenance, regulatory or other decisions made in relation to its plant, personnel, processes or industrial environment.

12. Children

MOSAICO is not intended for children.

MOSAICO is intended for business, professional and industrial use. We do not knowingly collect personal data from children through MOSAICO.

If you believe that a child has provided personal data to us without appropriate authorisation, please contact us at info@digita.work.

13. Third-Party Websites and Services

The MOSAICO website, web platform or mobile applications may contain links to third-party websites, app stores, services or resources.

We are not responsible for the privacy practices, content or security of third-party websites or services that we do not control. You should review the privacy notices of those third parties before using them.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in MOSAICO, our processing activities, providers, legal requirements, technical architecture, mobile applications, Mi-BOX configurations, cybersecurity services or business operations.

If we make material changes, we will provide notice where required by applicable law, for example by email, account notification, app notification or notice on our website.

The updated Privacy Policy will apply from the date indicated at the top of the document.

15. Contact Us

For questions, requests or complaints regarding this Privacy Policy or the processing of your personal data, contact:

Digita SRL

Via Verdi 3

24121 Bergamo, Italy

Email: info@digita.work

PEC: pec.digita@legalmail.it

Attention: Privacy