PIC PRIVACY NOTICE

Version 1.0

Effective date: 21 September 2026

1. Scope of this Privacy Notice

This Privacy Notice explains how personal data is processed when a user registers to obtain a Public Beta release of PIC through the official distribution website, receives a Download ID, downloads the software, or voluntarily submits an issue report, tester feedback or diagnostic information.

PIC is independent infotainment software for compatible Android-based head units installed in Porsche 987 and 997 vehicles. PIC is developed under the CHAPIN Software name.

2. Data Controller

Until a separate legal entity is established, CHAPIN Software is a project and development name rather than a separate legal entity.

The data controller is:
Giuseppe Surace, operating under the name CHAPIN Software
Italy
Privacy contact: privacy@chapinsoftware.com

3. Personal data collected during Public Beta registration and download

Required registration data: name and email address.

Automatically generated or recorded registration and distribution data: acceptance/registration identifier, Download ID, PIC release and build, release codename, version of the Public Beta Agreement, version of this Privacy Notice, date and time of registration and acceptance, timestamp of the most recent successful authorised download response, and the number of successful authorised download responses associated with the Download ID.

The download-response count records successful authorised server responses and does not establish that a browser or device received every byte of the APK.

Vehicle model, model year, head-unit model and Android version are not required merely to register for and download PIC. Relevant technical information may be requested when a user voluntarily submits an issue report, tester feedback, compatibility information or diagnostic material.

4. Website and security data

The PIC website uses Cloudflare infrastructure for website delivery, security, serverless application functions, data storage and anti-abuse verification.

Cloudflare may process limited technical information necessary to deliver and protect the service, including request and network metadata. Cloudflare Turnstile processes security signals such as client IP address, TLS fingerprint, User-Agent header, sitekey and associated origin to distinguish human users from automated traffic.

Turnstile is used for security and anti-abuse purposes. It is not used by PIC for advertising or behavioural profiling and does not receive the contents of the PIC registration, issue-report or tester-feedback form fields through the Turnstile widget.

5. Purposes of processing

Personal data is processed to administer access to the official PIC Public Beta download; record which version of the Public Beta Agreement and Privacy Notice applied to a registration; generate and associate a Download ID with the applicable release; authorise and record official download

responses; maintain the integrity and security of the distribution channel; receive and manage issue reports and tester feedback; respond to support, compatibility and diagnostic submissions; and investigate technical problems affecting the Public Beta.

Registration and support data is not used for unrelated advertising, behavioural profiling or the sale of personal data.

6. Legal basis

Where applicable, processing objectively necessary to provide the requested Public Beta download and administer the associated beta participation is based on Article 6(1)(b) GDPR: processing necessary for performance of the agreement entered into when the user accepts the PIC Public Beta Agreement, or to take steps at the user's request before providing the software.

Security and anti-abuse processing may also be based, where applicable, on the controller's legitimate interests under Article 6(1)(f) GDPR in protecting the website, distribution infrastructure and Public Beta programme, balanced against the rights and interests of users.

Optional issue reports, tester feedback and diagnostic material are processed for the purpose for which the user voluntarily submits them and under the lawful basis applicable to that processing. No consent for marketing is requested as part of PIC Public Beta registration.

7. Issue reports, tester feedback and diagnostic exports

When a user submits a Report an Issue form, PIC may record: Download ID; PIC release, build and codename; vehicle; head unit; Android version; affected area; problem description; reproduction steps; expected behaviour; observed behaviour; whether a diagnostic export is available; submission timestamp; and issue status.

When a user submits Tester Feedback, PIC may record: Download ID; PIC release, build and codename; vehicle; head unit; Android version; interface mode; functions used; overall experience; what works well; improvements; suggestions; additional comments; submission timestamp; and feedback status.

These submissions are associated with the registration through the Download ID. Name and email are not duplicated into the issue-report or tester-feedback record.

Diagnostic exports may be provided voluntarily when troubleshooting requires them. PIC does not automatically upload diagnostic exports. Depending on their contents, diagnostic exports may contain technical information about the head unit, Android environment, PIC configuration, application state, connected interfaces or events relevant to troubleshooting.

Users should not intentionally include passwords, private communications, unrelated personal information or other confidential data in issue reports, feedback or diagnostic submissions.

8. Data minimisation

PIC Public Beta registration is designed to avoid collecting information that is not needed for official distribution. The registration process does not require a home address, telephone number, vehicle identification number (VIN), registration plate, head-unit serial number, social-media account or hardware fingerprint.

Additional technical information is requested only where relevant to a support, compatibility, feedback or diagnostic activity.

9. Recipients and service providers

Personal data may be processed by service providers acting on behalf of the controller where necessary to operate, secure and support the Public Beta service.

Cloudflare services are used for website delivery and security, Workers-based application processing, D1 database storage, R2 release storage and Turnstile anti-abuse verification. The PIC

D1 database used for Public Beta registration, issue and feedback records was created with the European Union jurisdiction constraint. This constraint governs where that D1 database runs and persists data; it does not by itself mean that all Cloudflare network processing occurs only within the European Union.

Personal data is not sold to third parties.

10. International transfers

Cloudflare is a global service provider and some processing connected with website delivery, security or service administration may involve locations outside the European Economic Area.

Where personal data is transferred internationally, applicable transfer mechanisms and safeguards required by data-protection law are used by the relevant parties. The European Union jurisdiction constraint applied to the PIC D1 database concerns the location in which that database runs and stores data and should not be interpreted as a restriction on every aspect of Cloudflare network processing.

11. Retention

Public Beta registration, acceptance and official download records are retained for the duration of the PIC Public Beta programme and for up to 24 months after the programme ends, unless a longer period is necessary to comply with a legal obligation or to establish, exercise or defend legal claims.

Issue reports and Tester Feedback are retained until the relevant activity is resolved or closed and, in any event, for no longer than 24 months after the last activity on the record, unless further retention is necessary for a legal obligation or the establishment, exercise or defence of legal claims.

Diagnostic exports voluntarily provided for troubleshooting are retained only for the time reasonably necessary to analyse the relevant problem and, in any event, for no longer than 12 months, unless a documented need or legal obligation requires longer retention.

Data that is no longer necessary for the applicable purpose will be deleted or anonymised, subject to applicable legal requirements.

12. Security

Reasonable technical and organisational measures are used to protect personal data against unauthorised access, unlawful processing, accidental loss, destruction or damage.

Access to registration, issue, feedback and diagnostic records is limited to persons who need the information for operation, support, security or legal purposes.

13. Cookies and similar technologies

The PIC website is designed to minimise non-essential tracking and does not use advertising or behavioural-profiling cookies as part of the Public Beta registration process.

Cloudflare and Turnstile may use or process technologies and security signals that are strictly necessary to deliver and protect the service and to detect automated or abusive traffic. Where applicable, any additional non-essential technology will be introduced only with the notices or choices required by law.

14. Automated decision-making

PIC Public Beta registration does not involve automated decision-making or profiling that produces legal effects or similarly significant effects on users.

Automated security controls, including Turnstile, may be used to detect abuse or verify that a request is made by a human. They are used for security purposes rather than to create a PIC marketing or behavioural profile.

15. Your data-protection rights

Subject to the conditions and limitations provided by applicable law, users may have rights including access to their personal data, correction of inaccurate data, erasure, restriction of processing, objection to certain processing and data portability where applicable.

Where processing relies on consent for a future optional purpose, that consent may be withdrawn at any time without affecting the lawfulness of processing carried out before withdrawal.

Requests concerning personal data may be sent to: privacy@chapinsoftware.com.

16. Right to lodge a complaint

Individuals in the European Union have the right to lodge a complaint with a competent data-protection supervisory authority if they believe that their personal data has been processed in violation of applicable data-protection law.

For a controller established in Italy, the relevant supervisory authority will ordinarily include the Italian Data Protection Authority (Garante per la protezione dei dati personali), without prejudice to rights available under the GDPR in other Member States.

17. Children

The PIC Public Beta and its download registration process are intended for persons capable of installing and testing automotive software and accepting the applicable Public Beta Agreement.

The service is not designed to collect personal data from children. If it becomes known that personal data from a child has been collected in circumstances where it should not have been collected, appropriate steps will be taken to delete it.

18. Changes to this Privacy Notice

This Privacy Notice may be updated when the Public Beta infrastructure, processing activities or applicable requirements change.

The version and effective date are displayed on the official PIC website. Material changes affecting an existing processing activity will be communicated or otherwise addressed as required by applicable law.

The version of the Privacy Notice presented during each official download registration is recorded with the corresponding registration record.

19. Contact

For privacy questions or requests concerning personal data processed in connection with PIC:
Giuseppe Surace, operating under the name CHAPIN Software
Italy
Email: privacy@chapinsoftware.com

For technical support relating to PIC, the Public Beta, issue reports or diagnostic procedures, contact: support@chapinsoftware.com.

PIC is an independent project and is not affiliated with, endorsed by, sponsored by, approved by, or supported by Porsche AG.