

## PRIVACY POLICY - USERS

*pursuant to Articles 13 and 14 of EU Regulation 2016/679  
and the applicable privacy provisions*

### Foreword

Pursuant to Legislative Decree 196/2003 as amended and supplemented ("**Privacy Code**"), EU Regulation 2016/679 on the protection of personal data ("**Regulation**") and any other national and/or EU provision and/or regulation on the protection of personal data, Autostrada Pedemontana Lombarda S.p.A, with registered office in Via Pola, 12-14, 20124 Milan (MI), Data Controller ("**Company**" or "**Data Controller**"), hereby informs you that the personal data ("**Data**") provided during the establishment and/or execution of the contract or otherwise acquired as part of our Company's activity, may be processed in compliance with the following.

### 1. PURPOSE AND LEGAL BASIS FOR PROCESSING

The Controller collects and processes your personal data in the context of the existing contract with the Company, such as:

- name, surname, tax code and/or VAT number, place and date of birth, address, telephone number, e-mail address
- vehicle data (vehicle registration number, nationality, model, colour)
- motorway toll data
- pictures of the vehicle
- data on payment methods

The information processed is mandatory and necessary to properly execute the contract between you and our Company. Below is a list of the purposes for which your personal data ("**Data**") may be processed, as well as the legal basis for the processing thereof.

The Company processes the Data for:

- (i) the provision of services related to motorway infrastructure management;
- (ii) the calculation of motorway toll using the 'Free Flow' system;
- (iii) the toll payment (including the activation and management of the "Conto Targa" service and the "Rechargeable" service) and the recovery of unpaid tolls;
- (iv) the acknowledgement of any reports/requests and activities related to their management and execution (e.g. verification and reimbursement of payments);
- (v) the management and response to claims;
- (vi) the control and monitoring of the services on the network and on the platforms pertaining to the Data Controller and provided also due to the activities carried out on behalf of the Data Controller (access to reserved area, websites, etc.). Moreover, Computer Data will be processed for the implementation of procedures aimed at detecting and notifying personal data breaches (*data breach*). The legal basis for the processing is the performance of activities dependent on the relationship established as well as the fulfilment of legal obligations (detection and notification of *data breach* events);
- (vii) the fulfilment of legal obligations, regulations, national and EU legislation and provisions issued by legitimated authorities.

The legal basis for the processing of the Data processed for the purposes referred to in points (i), (iii), (iv), (v) is Article 6 paragraph 1 letter b) of the GDPR. Likewise, for the purposes referred to



in point (ii) the legal basis of the processing is Article 6 paragraph 1 letter f) of the GDPR. Finally, for the purposes referred to in points (vi) and (vii) the legal basis of the processing is Article 6 paragraph 1 letter c) of the GDPR.

Your data may also be collected from third parties such as, but not limited to:

- IT service provider;

and your data may be obtained through:

- lists kept by public or equivalent bodies or under the control of the public authority based on specific national regulations.

## **2. NATURE OF DATA PROVISION AND CONSEQUENCES OF FAILURE TO PROVIDE DATA**

For the above-mentioned purposes, the processing of Data is necessary and failure to provide such Data will result in the impossibility of executing the service contract between you and the Company.

## **3. CATEGORIES OF PERSONS TO WHOM DATA MAY BE DISCLOSED**

For the above-mentioned purposes, Data may be communicated to the following categories of subjects: Financial Institutions, Lawyers and Law Firms, Public Bodies, Information and Computer Assistance Companies, Auditing and Balance Sheet Certification Companies, Debt Collection Companies and Associated Companies for administrative-accounting purposes and for the purposes listed in paragraph 1.

## **4. DATA TRANSFER**

For the purposes stated above, the transfer of personal data to the entities referred to in paragraph 3, located in countries outside the European Economic Area, specifically Switzerland, is envisaged; with regard to such transfer, and pursuant to Chapter V of the GDPR, the relevant adequacy decision of the European Commission shall apply.

## **5. DATA PROCESSING METHODS**

Data is processed through paper or computer procedures by specially authorised and trained staff. They are granted access to your personal data to the extent and within the limits necessary for the performance of the processing activities that concern you.

The Data Controller periodically checks the means used to process data and their security measures and provides for their constant updating; through the persons authorised to process them, the Data Controller guarantees that no unnecessary personal data are collected, processed, filed or stored; it verifies that the data are stored with guaranteed integrity and authenticity and that they are used for the actual processing.

## **6. RETENTION OF PERSONAL DATA**

Data will be processed for the entire duration of the contractual relationship with our Company; after such period data will be retained in accordance with the ordinary limitation periods set out in the Civil Code or specific legal provisions, for administrative purposes and/or to assert or defend



a right or legitimate interest, and they will be deleted when the purposes for which it was collected no longer apply.

For computer data, retention depends on the presumed and/or detected risk and the detrimental consequences thereof, without prejudice to measures aimed at anonymising data or at limiting their processing.

In any case, data shall be kept (starting from the acknowledgment of the dangerous event or *data breach*) for the time necessary to notify the Supervisory Authority of the data breach detected through the procedures implemented by the Data Controller and in any case to remedy it.

## **7. RIGHTS OF DATA SUBJECTS**

Please be informed that, under the circumstances provided for in the Regulation, you may exercise the rights set out in Articles 15 of the Regulation as amended and supplemented, namely:

- request confirmation that Data are being processed and, if so, request access to information relating to such processing to the Data Controller;
- request the correction of inaccurate or incomplete Data;
- request the deletion of Data to the Data Controller;
- request restriction of processing;
- request to receive, in a commonly used and machine-readable format, Data concerning you or to obtain the direct transmission of such Data to another data controller, where technically feasible (so-called '*data portability*').

The Controller shall promptly do so and, at the latest, within one month of receipt of your request. The deadline may be extended by two months if necessary, considering the complexity and number of requests received by the Controller. In such cases, the Controller shall, within one month of receipt of your request, inform you of the reasons for the extension.

The aforementioned rights may be exercised by submitting a request to the Company at the following e-mail address: [privacy@pedemontana.com](mailto:privacy@pedemontana.com).

### **Right of objection**

For reasons relating to your particular situation, you may object to the processing of your personal data at any time, provided that your objection is based on a legitimate interest or it concerns the processing of personal data whose provision is subject to your consent, by submitting your request to the Controller at [privacy@pedemontana.com](mailto:privacy@pedemontana.com).

You have the right to the deletion of your personal data if no legitimate reasons override the one that gave rise to your request, and in any case if you have objected to the processing.

### **Right to lodge a Complaint**

Without prejudice to any other administrative or judicial action, you may lodge a complaint with the competent supervisory authority, i.e. the one performing its duties and exercising its powers in Italy where you reside or work or if different in the Member State where the breach of the Regulation (EU) 2016/679 occurred.

## **8. DATA PROTECTION OFFICER**



The *Data Protection Officer* ('DPO') may be contacted at the dedicated address [dpo@pedemontana.com](mailto:dpo@pedemontana.com).

**Data Controller**  
**AUTOSTRADA PEDEMONTANA LOMBARDA S.P.A.**