

On-line toll billing service

Information on the processing of personal data pursuant to European Regulation No. 679/2016

Pursuant to Article 13 of the European Regulation no. 679/2016 ("GDPR"), Autostrade per l'Italia S.p.A. hereby provides the following information on the processing of the Customer's personal data collected and processed as part of the activities carried out for the registration to the application of Autostrade per l'Italia S.p.A. at <https://autostrade.my.site.com/webformaspi> ("Site"), and for the provision of the **"on Line" Toll Invoicing Service**.

The Site is an innovative application provided and managed by Autostrade per l'Italia S.p.A. and aimed at offering its Customers the "on line" Toll Billing Service, which allows them to request: (i) the billing of receipts for payments made in cash, by credit and debit card, issued by the operator at the manual or automatic lanes; (ii) the billing of tolls paid as a result of Reports of Non-Payment ("RMPP") received directly at the exit toll booth or on payment reminder letters, as well as (iii) the billing of tolls paid with a viacard card in increments of the amount.

Additional services connected and/or ancillary to the payment of the motorway toll may be provided through the Site in the future, of which appropriate updates will be provided to Customers.

This Privacy Policy may be subject to change in order to comply with new legal provisions, changed data processing policies and/or following the modification of the features of the Site and/or the services offered herein. Each updated version of this Privacy Policy will be made available on the Site in the dedicated section to allow Customers to be always informed of the latest version published.

1. DATA CONTROLLER

The Data Controller is Autostrade per l'Italia S.p.A. (hereinafter "Autostrade"), a company subject to management and coordination by Holding Reti Autostradali S.p.A., with registered office in Via A. Bergamini, 50 - 00159 Rome, tax code, Rome Companies Register entry number and VAT no. 09743081003.

The Data Protection Officer (DPO) for Autostrade per l'Italia S.p.A. is domiciled for the purpose at the Company's registered office and can be contacted at the certified e-mail address: dpo@pec.autostrade.it.

With reference to the navigation logs of Customers browsing the Site, the Data Controller is Autostrade per l'Italia S.p.A. as owner of the technology underlying the Site. The relevant Cookie Privacy Policy is available at the bottom of the homepage of the Site www.autostrade.it.

2. TYPE OF DATA PROCESSED

Autostrade collects and processes the Customer's personal data when registering on the Site and, through the Site itself, as part of the "online" toll billing service ("Service").

More specifically, personal data processed by ASPI may include:

- During registration: personal and identification data (such as: name, surname, tax code, company name and VAT number); contact data (such as: telephone number, e-mail address); account access credentials (id number and password); IP address.

- When using the Service:
 - (i) in the case of Customer/person: same data as provided during registration, as well as transit data (such as: entry and exit track, day, time; photograph of the payment receipt/"receipt",

- Viacard card code to be scaled); vehicle data (number plate, nationality); credit card or Fastpay payment card number with which the toll was paid;
- (ii) in the case of Customers/legal persons: the personal and identification data of the contact person authorised by the Company to invoice the toll (name, surname, tax code); the Company's contact data (telephone number and e-mail address); the Company's name or company name; the Company's VAT number; transit data (such as: entry and exit track, day, time; photograph of the payment receipt/"receipt", Viacard card code to be used); data relating to the vehicle (e.g. licence plate, nationality) in use at the Company, credit card or Fastpay payment card number with which the toll was paid.

Such personal data ('Data') shall be kept up-to-date by the Customer in the dedicated section of the Site, since updating is an essential prerequisite for correct access to the Site and proper use of the Service.

In the future, further Data may be collected through the Site, in the event that the Customer subscribes to any new services connected and/or ancillary to the payment of motorway tolls that will be offered by Autostrade and for which specific information will be provided.

3. PURPOSE AND LEGAL BASIS OF PROCESSING

Data will be processed by Autostrade, according to principles of necessity, minimisation, lawfulness, fairness, proportionality and transparency exclusively, for the following purposes:

- a) allow the Customer to register and access/use the Site;
- b) enable the Customer to make use of the Service and allow the correct management of the Service provision activities (with the issuing of the required invoices);
- c) comply with legal obligations and requests by the competent authorities.

The legal basis for the processing of Data for the purposes referred to in (a) and (b) is the performance of a contract, ex art. 6.1 lett. b) of the GDPR. The legal basis for the processing of Data for the purpose referred to in (c) is the fulfilment of legal obligations, ex art. 6.1 lett. c) of the GDPR.

The provision of certain Data provided directly by the Customer for the purposes indicated above is compulsory for other Data is optional, as indicated in the forms to be filled in for registration, referred to in the Terms and Conditions of Use to which this Information Notice is attached. It is understood that failure to provide, partially or incorrectly, the Data marked as compulsory shall make it impossible for Autostrade to register on the Site and/or provide the Service.

4. METHODS OF TREATMENT

Data will be processed on paper and/or by telematic means, also with the aid of electronic and information means, directly and/or through delegated third parties, according to logics strictly related to the purposes indicated in paragraph 3 above. The Data will be processed in compliance with the GDPR and current legislation, and in any case in such a way as to guarantee the security and confidentiality of the same, to prevent unauthorised disclosure or use, alteration or destruction.

5. TIMES AND PLACES OF DATA STORAGE

Your Data will be stored in Autostrade's servers located in the European Union and will not be disseminated or transferred outside the European Union. Your Data will be processed by the Data Controller only for the time strictly necessary to pursue the purposes mentioned in paragraph 3 above, in compliance with the principle of minimization ex art. 5.1 c) of the GDPR.

In particular:

for the purpose referred to in point (a) of paragraph 3 above, the Data:

- shall be retained until the Customer automatically deletes the account through the function available on the Site indicated in the Terms and Conditions of Use (Article 11) or, alternatively, until the date of

- receipt of the express request of the exercise of the right to delete personal data sent by the Customer to the Data Controller's DPO, carried out in the manner indicated in paragraph 7 below;
- will be retained for 24 months in the event of non-use of the Site by the Customer, and then automatically deleted.

For the purpose referred to in point (b) of paragraph 3 above, the Data:

- will be retained for the period necessary for the management and provision of the Service.

For the purpose referred to in point (c) of paragraph 3 above, the Data:

- will be retained by the Controller as long as the need for the processing persists to fulfil legal obligations.

It is understood, however, that the Data Controller may retain the Data, within the limits of the law, in order to prove the fulfilment of its contractual obligations and defend its rights in relation to disputes outstanding at the time of cancellation or at the direction of the Authorities. The retention of Data by the Controller shall also be lawful if it is necessary to enable the Customer to fulfil a legal obligation or to ascertain, exercise or defend a right in court.

6. RECIPIENTS OF DATA

Within Autostrade, only the persons (employees and/or collaborators) entrusted with the processing by the Data Controller and authorised to carry out the processing operations within the framework of the aforementioned activities may become aware of personal data.

The data may be disclosed to third parties, delegated by the Data Controller, who are required to process the information always for the purposes set out in point 3 above and who are, for this purpose, appointed 'Data Processors' pursuant to Article 28 GDPR.

In particular, with reference to the Data processed for the purposes set out in paragraph 3, letter b) above, the administrative activities of toll invoicing and issuing and delivering invoices are carried out on behalf of Autostrade by EssediEsse S.p.A., with registered office in Rome, Via A. Bergamini, 50, 00159 Rome, appointed by Autostrade for this purpose.

The full list of persons appointed as Data Processors is available by contacting the DPO at the address given in paragraph 1 above.

The aforementioned data shall not be otherwise disclosed to third parties, with the exception of any disclosure to Judicial Authorities or public bodies entitled to request such data, in execution of national and/or Community provisions or regulations on the subject.

Under no circumstances will the personal data processed be disseminated.

7. RIGHTS OF THE INTERESTED PARTIES

Articles 15-22 of the GDPR give Data Subjects the possibility to exercise specific rights.

Il Cliente può ottenere dal Titolare del trattamento: l'accesso ai Dati (chiedendo la conferma dell'esistenza o meno degli stessi e di conoscerne il contenuto, l'origine, l'ubicazione geografica, nonché chiedendone copia - c.d. diritto di accesso), la rettifica o integrazione (c.d. right of rectification), the restriction of processing (so-called right of limitation), the revocation of consent (if consent has been given for the processing of Data), the portability of the data concerning him/her (so-called right of portability), as well as its deletion (so-called right of erasure).

In particular, with regard to the right of deletion of Data, the Customer has the right to obtain the deletion of Data concerning him/her in the following cases:

- the Data are no longer necessary for the purposes for which they were collected;
- the processing of the Data does not comply with the law;

- the Customer has deleted his/her account by accessing the personal section ("My Setting") or has filled in the request form on the Website or has sent an express request to exercise the right of deletion to Autostrade's DPO, in the manner indicated in article 11 of the Terms and Conditions of Use, to which this Information Notice is attached;
- 24 months have elapsed without use of the Site.

The customer also has the right to object to the processing. If the right to object is exercised, the Data Controller reserves the right not to process the request, and thus to continue processing, if there are compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject.

The aforementioned rights may be exercised by making a request to the Data Protection Officer (DPO) at the following PEC address: dpo@pec.autostrade.it, using the appropriate forms made available by the Data Controller on Autostrade's website www.autostrade.it.

The Data Subject may also lodge a complaint with the Italian Data Protection Authority P.zza Venezia, 11, 00187 Rome.