

Privacy Policy pursuant to Art. 13 GDPR on the processing of personal data for the management of nonpayment receipts (RMPP) and forced debt recovery in Italy.

Pursuant to the EU Regulation 2016/679 ("GDPR"), Autostrade per l'Italia S.p.A., Raccordo Autostradale Valle d'Aosta S.p.A., Tangenziale di Napoli S.p.A. and Società Autostrada Tirrenica S.p.A. (the "Companies"), in their capacity as autonomous Data Controllers, provide this Policy to users who do not pay, in whole or in part, the toll for a journey on the motorway network under their respective jurisdiction.

In the event of non-payment of the toll, the vehicle number plate is automatically recorded by cameras installed at both manned and automatic motorway tollbooths, and a receipt is issued (the "non-payment receipt" or "RMPP") certifying the non-payment and showing the vehicle data (class and number plate), journey data (date, time, day, exit tollbooth and, where available, entry tollbooth) and the amount to be paid.

In implementation of Legislative Decree 285/1992 (Italian Road Traffic Act), each Company processes the aforementioned data of users who are in breach of the obligation to pay the toll ("**Data Subjects**") for the purpose of ascertaining the non-payment of the toll, identifying the vehicle at the tollbooth where the violation occurred and the relative owner/keeper, the notification of the breach of the obligation to pay the toll, as well as for the consequent execution of civil actions (such as "forced debt recovery") and administrative and/or criminal actions, if the conditions are met, pursuant to Art. 176 of the Italian Road Traffic Act.

Without prejudice to the fact that each Company does not carry out any processing other than that expressly provided for herein, this Privacy Policy may be subject to amendments in order to comply with new legal provisions or changes to data processing policies. Any updated version of this policy will be made available on the institutional website of the Company, which users are invited to consult periodically for the latest published version.

This Privacy Policy does not extend to processing by third parties (as referred to in paragraph 4 below) whose privacy policies may be consulted on their websites. The Company accepts no liability for any such further processing and Data Subjects are advised to refer to the individual privacy policies of the third parties.

1. Data Controller

The autonomous data controllers, each for the motorway sections under its jurisdiction, are:

Autostrade per l'Italia S.p.A., with registered office in Via A. Bergamini 50 - 00159, Rome, whose Data Protection Officer can be contacted at the following address: dpo@pec.autostrade.it;

Raccordo Autostradale Valle d'Aosta S.p.A., with registered office in Via Alberto Bergamini 50 - 00159 Rome, whose Data Protection Officer can be contacted at the following address: dpo@pec.ravspa.it;

Tangenziale di Napoli S.p.A., with registered office in Via Giovanni Porzio, 4 -Centro Direzionale Isola A/7 - 80143, Naples, whose Data Protection Officer can be contacted at the following address: dpo@pec.tangenzialedinapoli.it;

Società Autostrada Tirrenica S.p.A., with registered office in Via Alberto Bergamini 50 - 00159 Rome, whose Data Protection Officer can be contacted at the following address: dpo@pec.tirrenica.it.

2. Categories of processed data

The Company collects and processes “general” personal data (“Data”) of Data Subjects including but not limited to:

- personal and contact data of the owner and/or keeper of the vehicle
- vehicle data (number and state of registration, number plate (including photo image), class, make)
- journey data (date and time, exit station and, where available, entry station).

Users are requested to keep their vehicle data up-to-date and complete, bearing in mind that this data is a prerequisite for the correct registration of the journey and consequent forced debt recovery action.

3. Purposes and legal basis for processing

The Data will be processed by the Company in accordance with the principles of necessity, minimisation, lawfulness, fairness, proportionality and transparency, and exclusively for the following purposes:

- a) to identify the vehicle and its owner/keeper and issue the "RMPP" and subsequent payment reminders;
- b) to manage enforced debt recovery actions (out-of-court and in court);
- c) to ensure the fulfilment of the Company's obligations towards the competent tax authorities;
- d) To fulfil legal obligations and requests by the authorities;
- e) to carry out civil, administrative and criminal actions where the prerequisites are met pursuant to Article 176 of Legislative Decree 285/1992 as amended (“Italian Road Traffic Act”).

The legal basis for the processing of Data for the purposes set out under (a) and (b) is the performance of a contract or pre-contractual measures, pursuant to Art. 6.1 lett. (b) of the GDPR, and for the purposes set out under (c), (d) and (e) is the fulfilment of a legal obligation to which the Company is subject, pursuant to Art. 6.1 lett. (c) of the GDPR.

4. Processing methods and data recipients

The Data shall be processed on paper and/or by digital means, also with the aid of electronic and computerised devices and automated processes for number plate capture and recognition and the registration of journey information, directly and/or through third parties, according to methods strictly related to the purposes indicated in paragraph 3 above.

The Data shall be processed in accordance with the GDPR and applicable law, and in such a way as to ensure the security and confidentiality of the Data, to prevent the unauthorised disclosure or use, alteration or destruction thereof. Within the Company, in its capacity as Data Controller, only those persons entrusted with processing activities and authorised to carry out the processing operations for the purposes set out in paragraph 3 above (employees and/or collaborators of the Company) may become aware of and process the Data.

Third parties may also become aware of and process the Data on behalf of the Data Controllers. In this case, said third parties are required to process the data for the same purposes as those indicated above, and are, for this purpose, appointed as “Data Processors” pursuant to Article 28 of the GDPR. In particular, the processing of the Data shall be carried out by **YouVerse S.p.A.**, a service company, specifically instructed by each Company to recover - also through third parties (professional firms) - the debt on behalf of the Companies, in compliance with the provisions set forth in paragraph 3 above.

The full list of persons appointed as Data Processors can be requested from each autonomous Data Controller.

In the event of a toll covering a journey carried out on several interconnected sections of motorway, each Company may become aware of and process, in its capacity as autonomous Data Controller, the journey data communicated to it by the other Concessionary Companies for the motorway sections for which they are responsible. The list of the interconnected motorway sections under the responsibility of each Autonomous Holder is published on the institutional website of each of them.

RMPP payment transactions are managed entirely and independently by a third party (**NEXI S.p.A.**), which will collect the Data necessary for this purpose directly from the Data Subject, with consequent application of its terms and conditions of use and privacy policy, which the user is invited to consult. The Companies do not carry out any processing in connection with payment transactions and have no access or visibility to/of the Data involved.

Lastly, these Data may be communicated by the Companies to other entities (**Professional firms**) that will process them, in their capacity as autonomous Data Controllers, for legal assistance in legal actions/proceedings in accordance with the law.

The Companies do not assume any responsibility with respect to the processing carried out by these autonomous Data Controllers, and Data Subjects should refer to their individual privacy notices. No Personal Data shall be disseminated, under any circumstances.

5. Data retention period and locations

The Data will be stored on the servers of the Companies or of a third party appointed for this purpose as Data Processor pursuant to Article 28 GDPR, located in Italy or in the European Union, and will not be transferred outside the European Union.

The Data will be kept by the Company only for the time strictly necessary to pursue the purposes stated in paragraph 3 above, in compliance with the principle of minimisation pursuant to Article 5.1.c) of the GDPR, and, in particular:

- (i) for the purposes referred to in points (a), (b) and (e) of paragraph 3 above, the Data shall be retained by the Company for the period necessary for the management and execution of the debt collection/toll payment until the associated debt is settled and, in any event, the retention of the Data by the Company shall be permitted and lawful where necessary to comply with an obligation of the Tax Authority, to demonstrate the fulfilment of its contractual obligations, and/or to establish, exercise or defend a right, including in court;
- (ii) For the purposes of points (c) and (d) in paragraph 3 above, the Data will be retained by the Companies for as long as necessary to fulfil any legal obligations or requests from the public authorities.

6. Rights of the Data Subject

Pursuant to privacy law, the Data Subject has the right to:

- obtain information in relation to the Data recorded, on the purposes for which the Data is processed, the period of processing and the persons to whom the Data is disclosed (right of access);
- obtain rectification or integration of inaccurate Data concerning the Data Subject (right of rectification);
- obtain the deletion of the Data concerning the Data Subject if the Data are no longer necessary for the purposes for which they were collected or if the processing of the Data does not comply with the law.

However, the Company notes that deletion of Data shall be withheld until the settlement of any debts associated with the RMPP, and that, in any case, the retention of the Data by the Company is lawful if it is necessary to allow it to fulfil a legal obligation or an order from the Authorities, to prove the fulfilment of its contractual obligations, or to ascertain, exercise or defend a right, including in court (so-called right of deletion);

- ensure that the Data concerning the Data Subject is only stored without any other use being made of it in the event that (a) the Data Subject contests the accuracy of the Data, for the period necessary to enable the accuracy of such Data to be verified; (b) the Data are necessary for the ascertainment, exercise or defence of a right, including in court.

The rights referred to in Articles 15-22 of the GDPR (including those noted above) may be exercised by making a request without formalities to the DPO, whose contact details are given in paragraph 1 above.

Finally, please note that Data Subjects have the right to contact the Italian Data Protection Authority (Garante per la protezione dei dati personali), Piazza Venezia, 11, 00187 Roma (RM), to assert their rights in relation to the processing of their personal Data.