

PRIVACY NOTICE
pursuant to Art. 13 of the European Regulation 2016/679 on

**PROCESSING OF PERSONAL DATA FOR THE SERVICES OF
ASSISTANCE AT TOLL STATIONS**

Autostrade per l'Italia S.p.A., in its capacity as Data Controller, provides, pursuant to Article 13 of the GDPR, the following information regarding the processing of personal data (Data) collected as part of the caring and customer assistance activities carried out by staff working at the station runways under the jurisdiction of Autostrade per l'Italia S.p.A.

Said caring and assistance activities will be provided, in favour of the Customer, by ASPI personnel within the framework of the "Collection Service", at the above-mentioned station runways under ASPI's competence (hereinafter, "**Service Points**")

The processing of Data is based on the principles of lawfulness, correctness, accuracy, relevance, minimisation and transparency, for the purposes described below, guaranteeing the protection of the confidentiality and rights of the customer (hereinafter, 'Customer or Interested Party').

1. Data controller

The Data Controller is ASPI, 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, registration number in the Companies' Register of Rome and VAT no. 07516911000.

ASPI has appointed a Data Protection Officer (DPO) who can be contacted at the PEC address: dpo@pec.autostrade.it.

2. Type of data processed

The personal data collected and processed by ASPI are 'common' data such as: personal identification data (e.g. name and surname, residence), identification document, contact data (e.g. e-mail address and mobile phone number), IBAN and vehicle registration number.

3. Purpose and legal basis of processing

Such Data will be processed by ASPI exclusively for the purposes indicated below, in relation to questions/requests related to the Collection Service, even if it is not possible to provide an immediate response to the Customer and, consequently, it is necessary to contact him/her at a later date: **(a)** assistance and informational support for the simultaneous payment of motorway tolls and/or for the payment of an RMPP (Report of Non-Payment); **(b)** assistance and informational support in relation to the reimbursement of a toll credit in the event of failure to pay or incorrect payment of change in the automatic lane and/or other anomalies; **(c)** handling complaints concerning the payment of motorway transits.

Personal data will be processed by ASPI only for the purposes connected with and/or functional to the management of activities related to requests for assistance and/or complaints, as indicated above.

If an identification document is requested and this contains any personal data relating to 'special categories' under Article 9 GDPR (e.g. data relating to health), these will not be processed.

The provision of personal data is optional but necessary for the pursuit of the aforementioned purposes; failure to provide, partial or incorrect provision of the requested data may result in the impossibility of providing the aforementioned assistance and caring activities and/or information support.

The legal basis for the processing of Data for the purposes set out in this paragraph is the performance of a contract or pre-contractual measures taken at the Customer's request, *pursuant to* Article 6.1 letter (b) of the GDPR. The express consent of the Customer is therefore not required.

4. Treatment modalities

This data will be processed, in compliance with the regulations in force, by means of computerised and telematic tools, with logics strictly related to the above-mentioned purposes, in such a way as to guarantee the security and confidentiality of the data.

5. Time and place of data storage

The personal data subject to processing, for the purposes described in paragraph 3, will only be kept for the time necessary to pursue the purpose for which they are collected in compliance with the principle of minimisation *pursuant to* Article 5.1.c) GDPR and, in any case, until the Customer's express request to delete the data, except in the case of any tax/financial fulfilments and in the case of ASPI's need to keep such data to defend its rights, also in relation to disputes existing at the time of the request or at the indication of public authorities.

These personal data are stored on servers located within the European Union.

6. Data recipients

Within ASPI, only those persons duly entrusted with the processing and authorised by ASPI to carry out the processing operations within the framework of the aforementioned activities may become aware of the personal data provided by the Customer.

Third parties (subsidiaries or third party companies involved) who are obliged to process the information for the same purposes as those set out in paragraph 3 above may also become aware of the Data and are, for this purpose, appointed "Data Processors". The list of subjects appointed as Data Processors may be requested from the DPO by writing to the PEC address dpo@pec.autostrade.it.

Under no circumstances will such personal data be disseminated or transferred outside the European Union.

7. Rights of data subjects

Finally, we would like to inform you that Articles 15-22 GDPR give the Data Subject the possibility to exercise specific rights vis-à-vis the Data Controller; in particular, the Data Subject may obtain from ASPI: access, rectification, cancellation, restriction of processing, revocation of consent, as well as portability of data concerning him/her.

Please also note that the data subject has the right to object to the processing. In the event that the right to object is exercised, ASPI reserves the right not to process the request, and therefore to continue processing, in the event that there are compelling legitimate reasons to proceed with processing that override the interests, rights and freedoms of the data subject.

The above rights may be exercised by making a request to the Data Protection Officer without formalities at the following PEC address: dpo@pec.autostrade.it, or by using the appropriate forms made available by ASPI on its website www.autostrade.it.

Finally, we inform you that the Data Subject may lodge a complaint pursuant to Art. 57 lett. f) GDPR with the Italian Data Protection Authority (Piazza Venezia, 11 - 00187, Rome RM) to enforce his/her rights in relation to the processing of data.

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