

**"ADVANCED ELECTRONIC SIGNATURE" SERVICE - INFORMATION ON THE
PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU)
2016/679**

Autostrade per l'Italia SpA (hereinafter also referred to "ASPI") has implemented, as part of its Staff recruitment and hiring process, the "Advanced Electronic Signature" Service, based on "One Time Password" technology via SMS, (hereinafter "AdES Service"), which enables the use, as an alternative to traditional paper documents, of a fully computerised signature, which can be placed remotely, without the physical presence of the person concerned ("Candidate and/or Employee"), to sign the contractual documentation for recruitment as well as additional documents aimed at managing the employment relationship. ASPI has adopted this method by pursuing sustainability in its production processes, also with reference to the Protection and Safeguarding of the Environment. The use of the AdES Service to formalise the aforesaid documentation, is upon signing the **Application Form for the Advanced Electronic Signature Service**, to which this Information is attached. Therefore, Autostrade per l'Italia S.p.A, as Data Controller, provides, pursuant to art. 13 of European Regulation 2016/679 (GDPR), the following information on the processing of the personal data of the Data Subject ("Candidate and/or Employee"), required to join and manage the AdES Service.

1. DATA CONTROLLER

Autostrade per l'Italia S.p.A. (ASPI) with registered office in via A. Bergamini, 50 - 00159 Rome. The Data Protection Officer (DPO) for Autostrade per l'Italia S.p.A. can be contacted at the following email address: dpo@pec.autostrade.it.

2. TYPES OF DATA PROCESSED

The personal data, collected when subscribing to the AdES Service, for signing the AdES Service Form and the documents mentioned in the introduction, include common data (full personal data, e-mail address, mobile phone number, identification document, etc.).

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

Personal data will be processed by ASPI for the sole purposes connected with and/or useful for the management of the activities inherent to membership to and management of the AdES Service, to allow the use of AdES and, in particular, for: - the management of the electronic membership process, through the AdES, of the IT document for joining the AdES Service and of the contractual documentation described in the introduction; - the management of the filing and digital storage process of the signed documents. The provision of personal data is optional and voluntary yet necessary for the proper management of the processes above; failure to provide the requested data/partial provision of data/inaccurate provision of data will result in the impossibility of subscribing to/using the AdES Service.

4. DATA PROCESSING METHODS

Personal data will be processed, in compliance with the regulations in force, through manual, IT and telematic tools and by implementing procedures strictly related to the aforementioned purposes, so as to ensure the confidentiality and security of the data. Specific security measures shall be complied with to prevent the loss of data, unlawful or improper use and unauthorised access. The IT documents signed by the Data Subject as described above shall be valid and relevant for all legal purposes and comply with all regulatory obligations and the technical rules on the subject, as set out in the Application Form for the AdES Service. The Data

Subject will receive a copy of the signed Subscription Form through the AdES by email (in pdf format or via a link from which they can download a copy of the form). The Data Subject shall be informed that the signature provided by the "Advanced Electronic Signature" process cannot be reproduced and is used only in fulfilment of the obligations provided for by laws and regulations or by provisions of the Authorities as well as limited to the single subscription to the AdES Service and to the single operation to sign the documents described in the introduction. The technological characteristics of the "advanced electronic signature" process set up by ASPI are described and available on ASPI's website at <https://www.autostrade.it>.

5. DATA RETENTION PERIOD

The personal data provided by the Data Subject to subscribe to the AdES Service (including a copy of the identification document) will be stored, as per legal provisions, for at least 20 years, guaranteeing their availability, integrity, legibility and authenticity. The IT document, signed with the AdES, will be stored, in digital mode, in compliance with the methods and times defined by the laws in force, and may be retrieved, consulted and printed, if necessary, in the event of litigation, disputes or other legally necessary procedure.

6. DATA RECIPIENTS

Within Autostrade per l'Italia S.p.A., only the persons tasked with the processing by the Data Controller and authorised to perform the processing operations within the scope of the aforementioned activities may acquire the personal data provided. Personal data may be disclosed to third parties (parent/subsidiary companies involved or third-party companies) who are required to process the information for the same purposes as set out in point 3, and which are, for this purpose, appointed as "Data Processors". Specifically, the personal data will be disclosed exclusively to the provider of the advanced electronic signature IT service, In.Te.S.A. S.p.A., which enables the operation and maintenance of the AdES technology and of the related platform, required to process such data for the same purposes as those set out in point 3 above. The full list of persons appointed as Data Processors is available from the DPO. Under no circumstances will personal data be disseminated.

7. TRANSFER OUTSIDE THE EUROPEAN UNION

Data are managed and stored on servers of third-party companies appointed as Data Processor. The servers used to store the above data are located in Italy and within the European Union. Personal data may not be transferred outside the European Union. However, should it become necessary to transfer the data to non-EU countries, the Data Controller shall be entitled to transfer such data to non-EU countries. In this case, the Data Controller shall ensure that data are transferred in compliance with the applicable legal provisions, by reassuring Data Subjects on the existence of a motivated decision by the European Commission, or by adopting the standard contractual clauses provided for by the European Commission, or by preparing, with any third-party recipients, appropriate data protection clauses.

8. RIGHTS OF DATA SUBJECTS

The Data Subject may at any time revoke consent to join the AdES Service by submitting a request as indicated in the AdES Service Application Form, without this resulting in the termination of the employment relationship with ASPI. Please be informed that Articles 15-22 of European Regulation no. 679/2016 allow Data Subjects to exercise specific rights; Data Subjects may obtain from the Data Controller: access, correction, cancellation, restriction of processing, revocation of consent as well as portability of data concerning them. Data Subjects may also object to the processing. Where the Data Subject exercises the right to object to the processing, 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 prevail over the interests, rights and freedoms of the Data Subject. The aforementioned rights may be exercised by making a request addressed without formalities to the Data Protection Officer (DPO) at the following PEC address: dpo@pec.autostrade.it, by using the appropriate forms made available by the Data Controller on the website www.autostrade.it. We would also like to inform you that you may lodge a complaint with the Data Protection Authority.

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