# Information on the processing of personal data provided through the Toll Reimbursement Webform

## Information pursuant to Article 13 of European Regulation 2016/679

Pursuant to current privacy regulations (Article 13 of European Regulation 2016/679 - GDPR), Autostrade per l'Italia S.p.A. provides information on the processing of personal data that Users provide by filling in the "Aspi website web form" online, published in the "Contacts" section of the website <a href="www.autostrade.it">www.autostrade.it</a>, in order to request a motorway toll reimbursement within the "Reimbursement Campaign" initiative communicated by Autostrade per l'Italia S.p.A. on the website www.autostrade.it.

### 1. DATA CONTROLLER

Autostrade per l'Italia S.p.A. with registered office in Via A. Bergamini, 50 - 00159 Rome.

The Data Protection Officer (DPO) of Autostrade per l'Italia S.p.A. is domiciled for the purpose at the Company's registered office.

#### 2. TYPES OF DATA PROCESSED

The personal data collected and processed by Autostrade per l'Italia S.p.A. by the Form on the web page of the above-mentioned site (hereinafter "Form"), include "common" personal data.

Autostrade per l'Italia S.p.A. does not process data that is not strictly necessary for the purposes set out below.

## 3. PURPOSE AND LEGAL BASIS OF PROCESSING

The personal data entered in the Form are processed by Autostrade per l'Italia S.p.A. for the sole purposes connected with and/or functional to the management of motorway toll reimbursement payment operations, provided that the prerequisites communicated by Autostrade per l'Italia S.p.A. are met.

The provision of personal data is mandatory in order to manage the reimbursement requested; therefore, failure to provide the requested data, or providing partial or incorrect data, may result in the impossibility of managing the reimbursement activities.

In compliance with the principle of minimisation, the User is kindly requested not to insert in the Form redundant personal data and additional to those required with respect to the above-mentioned purposes. In case they are provided, Autostrade per l'Italia S.p.A. will refrain from using such data.

### 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.

## 5. DATA RETENTION PERIOD

Personal data will only be stored for as long as necessary for the purposes for which they are collected in compliance with the principle of minimisation pursuant to art. 5(1)(c) of the GDPR.

## 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.

Data may be disclosed to third parties (parent/subsidiary companies involved or third-party companies) as well as IT services providers, which enable the operation and maintenance of the platform, required to process the data for the same purposes as set out in point 3 above, who are, for this purpose, appointed as "Data Processors".

In particular, the administrative activities relating to motorway toll reimbursement are carried out on behalf of Autostrade per l'Italia S.p.A. by EssediEsse SpA, with registered office in Rome, Via A. Bergamini, 50 - 00159 Rome, appointed as Data Processor for this purpose, pursuant to art. 28 of the GDPR.

The full list of persons appointed as Data Processors is available from the DPO.

Under no circumstances will personal data be disclosed or disseminated.

### 7. RIGHTS OF DATA SUBJECTS

Finally, please be informed that Articles 15-22 of the GDPR no. 679/2016 allow Data Subjects to exercise specific rights; Data Subjects may obtain from the Data Controller: access, correction, cancellation, restriction of processing.

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 also inform you that you may lodge a complaint pursuant to art. 57(f) of the GDPR with the Data Protection Authority.

Version 2.1 of 09.02.2022