

PERSONAL DATA PROTECTION NOTICE (EU Regulation 2016/679) “URBAN PASS” PROMOTION

Dear User,

Autostrada del Brennero S.p.A. as data controller hereby informs you, pursuant to Articles 13 and 14 of the EU Regulation of April 27, 2016, no. 679 “General Data Protection Regulation” (hereinafter referred to as the “Regulation”), that the information contained in the form for Urban Pass promotion you have requested and the data derived from the provision of this service will be processed as follows:

1. Purposes and lawful basis of the data processing

The data are processed for management and administrative purposes linked with the service requested and, with your consent, to send informative/promotional material about the initiatives promoted by Autostrada del Brennero S.p.A. and informative material about the initiatives and events in the regions crossed by the A22 section of motorway. Once they have been aggregated and anonymized, data can also be processed for statistical analysis purposes related to traffic flows and entrance to motorway stations. The lawful bases for the processing for management and administrative purposes are the contract you are party to and the statutory legislation linked to administrative and accounting activities. The lawful basis for processing data for the sending of informative and promotional material is your express consent. If supplied, this consent can be revoked at any time.

The Autostrada del Brennero S.p.A toll stations are equipped with a video recording system that, when non-payment of the toll occurs or if the customer fails to present the entrance toll ticket or engages the control systems improperly or with malfunctioning devices it automatically records the license plate of the vehicles in transit for subsequent toll payment and, where necessary, to complete a civil, administrative and/or criminal case where provided for in Article 176 of the Legislative Decree 285/1992 (Road Traffic Law).

2. Conferment and storage of data

Conferment of the data requested is necessary for management and administrative purposes and their absence, even partial may compromise the activation of the “Urban Pass” promotion. The data will be conserved for the length of the contractual relationship and for the time established by the applicable legislation in statutory, accounting and tax matters. The consent to receive information and promotional material is optional and has no bearing on the activation of the promotional offer. The data for this purpose may be processed for 24 months after the conclusion of the contract or until consent is revoked.

3. Recipients of personal data

The personal data will be processed by authorized and appropriately trained personnel who operate under the authority and management of the Data Controller. The personal data may also be processed by third parties who provide necessary services, among which communication, email, mail delivery and IT services and other service suppliers inherent in the aforementioned purposes: Only the data strictly necessary for these operations will be communicated to the aforementioned persons. The updated list of all recipients and managers is available at the Data Controller’s headquarters.

4. Data subject rights

The data subject may exercise the rights provided for in Chapter 3 of the aforementioned Regulation. In particular, the data subject has the right to ask the Data Controller for access to data collected on them, their correction or deletion, the updating of incomplete data and restriction of processing. They have the right to receive the data in a commonly used and structured format, readable on an automatic device and the right to object to all or part of the use of the data as well as exercising the other rights granted by the applicable legislation. Furthermore, the data subject has the right to revoke any consent given, at any time. Such rights may be exercised in writing via post to the Data Protection Officer (DPO). Pursuant to the Article 77 of the EU Regulation 2016/679, the data subject also has the right to lodge a complaint with the Data Protection Authority if they believe that the processing violates the Regulation.

5. Data Controller and Data Protection Officer

The Data Controller for personal data processing is **Autostrada del Brennero S.p.A.** with headquarters in Via Berlino 10, 38121, Trento, Italy. The Data Protection Officer (DPO) is domiciled for duties at the Data Controller’s headquarters and can be contacted through the following means: Tel 0461 212611 – Fax 0461 234976 – email privacy@autobrennero.it.