PRIVACY POLICY for the A22 website

Autostrada del Brennero S.p.A undertakes to respect the Website user's privacy under the terms provided by the applicable laws regarding the protection of personal data and in particular the EU Regulation 2016/679 (hereinafter “Regulation”) and the Legislative Decree 196/2003 and subsequent amendments.

This document (“Privacy Policy”) provides information on the processing of personal data collected through this website (hereinafter “Website”) and serves, therefore, as notification to the data subjects of the aforementioned regulations (hereinafter Applicable Legislation). The policy is only applicable to this site and does not cover any website that may be consulted by the user through links.

DATA CONTROLLER AND DATA PROTECTION OFFICER

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 is domiciled for duties at the Data Controller’s headquarters and can be contacted through any of the following means: Tel 0461 212611 – Fax 0461 234976 – email privacy@autobrennero.it.

THE DATA WE PROCESS

These data may be subject to processing:

BROWSING DATA:
The personal data processed of Users who only visit the Website (i.e. without sending communications or using restricted areas) is limited to browsing data, meaning those data transmitted to the Website necessary for the operation of the IT systems put in place for website management and for the internet protocol communications. Examples included in this category are the IP address or the computer domain used to visit the Website and other parameters relative to the operating system employed by the user to connect to the Website. The company collects these and other data (for example, the number of visits and the time spent on the Website) only for statistical purposes and in an anonymous form for the purpose of controlling Website function and improving its operation. This information collected is not associated with other information on the User or to identify him/her. However due to the nature of this information they can lead to the identification of the User through processing and association with data held by third parties. The lawful basis of the processing is the legitimate interest of the Data Controller for the technical management of the Website’s function and security.

COOKIES
Cookies are small text files that the Website places on the device used, either computer or mobile devices, and are saved in the directory used by the User's web browser. There are various types of cookie, some make using the Website more efficient, others enable functions.

Technical cookies
In our Website we use technical cookies for the management of browsing and for the management of User authentication in the reserved area (session cookies). These cookies expire when the session is closed by the user.

Analytic cookies
There are also analytic cookies present that collect information, in aggregated form, on the number of Users and on how they use the Website. In particular, the Website uses the service from Google Analytics, their cookie policy can be viewed at the address https://support.google.com/analytics/answer/6004245

To respect the privacy of our Users, the service is used in the "_anonymizeip" mode that masks the IP address of the Users who visit the Website.

The lawful basis for this processing for technical management and statistical analysis is the legitimate interest of the Data Controller for the analysis of website use.
Interaction with social network and external platforms

There may also be the presence of further cookies inherent in the services and applications used by the Website (e.g. for the management of video or other services).

**Widget Video YouTube (Google Inc.)**

YouTube is a playback service for video content managed by Google Inc. that allows this app to integrate such content into its pages.

For more information: [http://www.google.com/intl/it/policies/privacy](http://www.google.com/intl/it/policies/privacy)

In the event of interaction or sharing of Website content via social networks or other external platforms further cookies may be sent to the user’s device. The information acquired by each application is always subject to the User’s privacy settings on the specific social network.

**Like button and Facebook social media widgets**

The Like button and Facebook social media widgets are interactive services with the Facebook social media network supplied by Facebook Inc.

For more information: [https://www.facebook.com/privacy/explanation](https://www.facebook.com/privacy/explanation)

**+1 button and Google+ social media widgets**

The +1 button and Google+ social media widgets are interactive services with the Google+ social media network supplied by Google Inc.

For more information: [http://www.google.com/intl/it/policies/privacy](http://www.google.com/intl/it/policies/privacy)

The lawful basis of this processing is the users consent expressed on entrance to the Website via the consent button on the cookie banner or during registration to the relative social media networks and Google.

**How to manage the installation of Cookies**

Users can manage cookie preferences directly on their own browser and, for example, prevent third parties from installing them. Using the browser preferences cookies installed in the past can be deleted, including the cookie with the saved consent for the installation of cookies from this Website.

Users can choose to enable or disable cookies by managing the settings on their internet browser according to the instructions available from the relative supplier at the following links:

Chrome
[https://support.google.com/chrome/answer/95647?hl=it](https://support.google.com/chrome/answer/95647?hl=it)

Firefox
[http://support.mozilla.org/it/kb/Eliminare%20%20cookie](http://support.mozilla.org/it/kb/Eliminare%20%20cookie)

Internet Explorer

Opera

Safari
[https://support.apple.com/kb/ph21411](https://support.apple.com/kb/ph21411)

**DATA PROVIDED VOLUNTARILY BY THE USER**

The optional, explicit and voluntary sending of messages via forms and email to the addresses indicated on this Website involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data requested on the form or inserted by the User in the message. The lawful basis for processing this data, needed to carry out the user’s specific requests, is the execution of a contract that the data subject is party to (if the person writing is our customer) or the performance of pre-contractual measures adopted on request by the same. All the forms are provided with the information regarding the purposes foreseen for the specific procedure.

**HOW WE STORE DATA AND FOR HOW LONG**
In compliance with the provisions of the Regulation, the IT systems and IT programs used by the Data Controller are configured to reduce the use of personal and identification data to the minimum. The data will be conserved for the length of time strictly necessary to deliver a concrete outcome of the purposes pursued and, in any case, the criteria used to determine the storage period is in compliance with the terms permitted under the applicable law and principals of minimization of data processing, limitation of storage and rational management of archives.

The browsing data are kept for any technical analyses relative to the functioning and security of the Website for a period of 60 days and thereafter deleted. They may be kept for a longer period and disclosed to the law enforcement authorities to ascertain and identify the perpetrators of any computer crimes committed against the Website or through the Website.

The data obtained from cookies (technical or analytical) are anonymized and do not permit the identity of the user to be traced.

The data transmitted voluntarily by the user (via email) will be stored for the length of time strictly necessary to achieve the purposes underlying the request. In the case of requests for information, the data will be kept until the reply process to the request has been concluded. In the case of requests or communications of a contractual nature or of complaints, the data will be kept for the time stipulated by the legislation in force.

**HOW WE GUARANTEE PERSONAL DATA SECURITY AND QUALITY**

The company undertakes to protect the security of User’s personal data and complies the provisions on security provided for in the applicable legislation to avoid data loss, illegitimate or illegal use of data and unauthorized accesses to them.

**RECIPIENTS OF PERSONAL DATA**

Your personal data may be shared, when strictly necessary, for the purposes indicated with:

a. persons appointed by the company for specific personal data processing needed for activities strictly related to the provision of services who are appropriately trained and required to protect confidentiality.
b. third party subjects that provide necessary services to the Company, typically as data controllers, such as operators of communication, email and mail delivery services for the management of the Website, suppliers of IT services or, depending on the subject of the request, suggestion or complaint, to suppliers of products and services inherent in the nature of the complaint or suggestion.
c. persons, agencies or authorities to whom communication of your personal data is mandatory pursuant to legal provisions and orders by the authorities.

Such persons will only receive the data needed for the relative operations and will undertake to use them only for the aforementioned purposes and process them in accordance with the applicable privacy legislation. The updated list of all data controllers is available from the Data Controller.

**USERS’ RIGHTS**

Users may exercise the rights provided for in Chapter 3 of the Regulation. In particular, they have 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; to receive the data in an commonly used and structured format, readable on an automatic device; to revoke any consent given in regards to data processing; to object to all or part of the use of the data as well as exercising the other rights granted by the applicable legislation. These rights can be exercised by sending a letter by post to the Data Protection Officer (DPO), domiciled for duties at the Data Controller’s headquarters, or by email sent to the following address: privacy@autobrennero.it.

Pursuant to the Article 77 of the Regulation, the User also has the right to lodge a complaint with the Data Protection Authority if they believe that the processing violates the Regulation.