INFORMATION ON THE PROCESSING OF PERSONAL DATA AGREEMENTS

(Art. 13 of EU Regulation 27 April 2016 n. 679)

1. Data Controller and Data Protection Officer

The Data Controller is Autostrada del Brennero S.p.A., with registered office in via Berlino 10, 38121 Trento. The Data Protection Officer (DPO) is domiciled for his functions at the Controller's office and can be contacted at the following details: tel 0461.212611 - Fax 0461.234976 – e-mail: privacy@autobrennero.it.

Autostrada del Brennero S.p.A., as Data Controller, informs that the processing of personal data will be based on the principles of lawfulness, fairness, transparency, purpose limitation and storage limitation, data minimization, accuracy, integrity, and confidentiality. In accordance with Articles 12 and following of EU Regulation 27 April 2016, n. 679 (General Data Protection Regulation, hereinafter also GDPR) and applicable Italian legislation, you are informed that personal data will be processed as described below.

2. Purposes of the Processing

Personal data relating to the contracting parties or their representatives, members, employees, and collaborators may be processed for purposes functional to the execution of obligations arising from the agreement, for compliance with regulatory obligations (in particular accounting and tax obligations), and for the protection of rights deriving from the agreement or third-party rights provided for by current legislation.

3. Legal Basis and Provision of Data

The processing of personal data can be based on the following legal bases:

a) necessity of processing for the conclusion of the agreement (Art. 13 par. 2 let. e) GDPR) or the execution of the agreement or pre-contractual measures adopted at the request of the data subject (Art. 6 par. 1 let. b) GDPR);

b) necessity of processing to comply with legal obligations to which the Data Controller is subject (Art. 6 par. 1 let. c) GDPR);

c) necessity of processing for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller (Art. 6 par. 1 let. e) GDPR);

d) necessity of processing for the pursuit of the legitimate interest of the Data Controller or third parties (Art. 6 par. 1 let. f) GDPR).

The provision of the requested personal data is necessary for the aforementioned purposes. Failure to provide, or partial provision of, the requested personal data will not allow the conclusion of the agreement or compliance with the provisions of current legislation (Art. 13 par. 2 let. e) GDPR).

4. Data Retention

Personal data will be stored by the Data Controller for as long as necessary or permitted in light of the purposes for which the personal data were obtained.

The criteria used to determine retention periods are based on:

- duration of the agreement;
- regulatory obligations weighing on the Data Controller, with particular reference to the fiscal and tax fields;
- necessity or opportunity of retention for the pursuit of the legitimate interest of the Data Controller, such as the judicial protection of its rights;

- general provisions regarding the prescription of rights.

5. Processing Methods and Recipients of Personal Data

Personal data will be processed in paper, computerized, and electronic form, in compliance with the security rules provided by the applicable current legislation and/or internal Regulations, by authorized personnel appropriately instructed and operating under the authority and responsibility of the Data Controller. Personal data may also be processed by third parties designated, if applicable, as Data Processors pursuant to Art. 28 of the Regulation, who provide instrumental services, including communication services, electronic mail, delivery of correspondence, technical IT services, freight transport companies, banks and credit institutions, debt collection companies, legal, tax, and commercial consultancy firms or studios, insurance companies, and other providers of services related to the aforementioned purposes. Only data strictly necessary for the fulfillment of their respective functions will be communicated to these entities. The updated list of all recipients and processors is available at the registered office of the Data Controller.

Personal data may be communicated, without requiring the data subject's consent, to public or private entities who, according to current legislation, are required to know them or may know them, as well as to entities holding the right of access pursuant to Law n. 241/1990 and Legislative Decree n. 33/2013. Likewise, data will be subject to dissemination, in compliance with the principle of minimization, exclusively for compliance with data publication obligations imposed by current legislation regarding transparent administration.

The data will not be subject to transfer to a non-European third country, communication and dissemination outside the cases indicated above, or automated decision-making processes, including profiling as referred to in Art. 22, paragraphs 1 and 4, GDPR.

6. Rights of the Data Subject

The Data Subject may exercise at any time the rights provided for in CHAPTER III of the General Data Protection Regulation. In particular, the data subject has the right to request from the Controller access to data concerning them, their rectification or erasure, integration of incomplete data, limitation of processing; to receive the data in a structured, commonly used, and machine-readable format; to object, in whole or in part, to the use of data. These rights can be exercised by writing by post to the Data Protection Officer (DPO), domiciled for his functions at the office of the Controller.

Furthermore, pursuant to Art. 77 of EU Regulation 2016/679, the data subject has the right to lodge a complaint with the Data Protection Authority if they believe that the processing violates the aforementioned Regulation.