Privacy Policy on the Processing of Personal Data of Website Visitors

(Regulation (EU) 2016/679, Art. 13)

Purpose of this Information

Pursuant to Article 13 of Regulation (EU) 2016/679, hereinafter "GDPR", this page describes the methods for processing the personal data of users who consult the website of Autostrada del Brennero S.p.A., accessible at:

https://www.autobrennero.it/en

The privacy policy concerns all pages and services belonging to the specified website. It does not, however, concern other third-party websites, pages, or online services reachable through hypertext links that may be published on the website.

Data Controller

The Data Controller is:
Autostrada del Brennero S.p.A.
Via Berlino, 10 38121 Trento (TN), Italy
Tel. 0461 212611 Fax 0461 234976 E-mail: privacy@autobrennero.it

Data Protection Officer

The Data Protection Officer (DPO) can be contacted at:
Autostrada del Brennero S.p.A.
Via Berlino, 10 38121 Trento (TN), Italy
Tel. 0461 212611 Fax 0461 234976 E-mail: privacy@autobrennero.it

Types of Data Processed, Purposes, and Legal Bases

Navigation Data

The computer systems and software procedures used to operate and protect the website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This category includes, by way of example:

- IP addresses and information relating to the network and operator used;
- identifiers associated with individual requests;
- URI or URL addresses of the requested resources;
- the date and time of the request;
- the method used to submit the request to the server;
- the numerical code indicating the status of the response;
- the originating website or page;
- information relating to the browser, operating system, device, and version of the protocol used;
- information relating to the country from which the request originates;
- elements useful for assessing the nature of the request and the possible presence of automated traffic, anomalies, attack attempts, or other security threats.

This data is not collected for the purpose of identifying users, but could allow identification through processing or association with information held by third parties.

The website also uses Cloudflare services to protect the IT infrastructure, filter traffic, prevent and contrast cyberattacks, and allow the safe and efficient distribution of contents. Cloudflare processes, on behalf of Autostrada del

Brennero S.p.A., information relating to requests directed to the site, including the IP address, request identifiers, technical characteristics of the device and browser, requested resources, and elements used to assess their risk level.

Navigation and security data are processed to:

- allow the user to consult the site and use the requested features;
- ensure the proper functioning, availability, and security of the website;
- distribute content efficiently;
- detect and filter automated or malicious traffic;
- prevent and manage anomalies, malfunctions, unauthorized access, and cyber incidents;
- ascertain responsibility in case of hypothetical computer crimes against the website;
- respond to requests from competent authorities.

The processing necessary to make the website and the features requested by the user available is based on Article 6(1)(b) of the GDPR.

Processing carried out to ensure the security and availability of the website, prevent and manage cyber incidents, and ascertain hypothetical crimes is based on the legitimate interest of the Controller, pursuant to Article 6(1)(f) of the GDPR.

Processing carried out to comply with requests from competent authorities is based on Article 6(1)(c) of the GDPR.

Website Usage Data

The website uses Matomo to generate navigation statistics and improve the content and services offered. To this end, data relating to pages visited, interactions with website content, and the technical characteristics of the browser and device used may be processed.

Further information on the tools used, their purposes, and their duration is available in the Cookie Policy.

YouTube Video Content

Video content hosted on the YouTube platform is embedded in the pages of the website. When the user chooses to view a video, a connection is established with YouTube's servers. The provider may then receive information relating to the device used, the IP address, the page visited, and the playback of the content, as well as use cookies and other tracking tools.

YouTube processes this data as an independent data controller, according to the purposes, methods, and retention periods indicated in its own privacy policy. YouTube does not process this data on behalf of Autostrada del Brennero S.p.A.

The activation of YouTube content is optional. Failure to load the videos does not prevent the consultation of other pages and information on the website.

Further information on cookies and other tools used is available in the Cookie Policy. For information relating to the processing carried out by YouTube, please refer to YouTube's privacy policy.

Data Voluntarily Provided by the User

The optional, explicit, and voluntary sending of messages through the forms available on the website or to the e-mail addresses indicated involves the acquisition of the sender's address, necessary to reply to the request, as well as any further personal data included in the message or required by the form.

The data is used exclusively to:

- reply to user requests;
- provide the requested information, services, or performances;
- manage any reports or communications;
- carry out administrative and organizational activities related to the request.

The processing is based on Article 6(1)(b) of the GDPR, as it is necessary to respond to the request of the data subject or to take pre-contractual steps at their request.

When processing is necessary to fulfill a legal obligation, the legal basis is Article 6(1)(c) of the GDPR.

Specific privacy notices may be published on pages set up for particular services, which integrate this general policy.

Nature of Data Provision

Apart from what is specified for navigation data, the user is free to provide the personal data requested in the forms or in communications sent to the Controller.

Failure to provide the necessary data may make it impossible to respond to the request or to provide the requested information, services, or performances.

The activation of YouTube video content is optional and does not affect the possibility of consulting other pages of the website.

Data Recipients

Personal data may be processed by:

- personnel of Autostrada del Brennero S.p.A. authorized and instructed in relation to their duties;
- providers of IT, support, maintenance, hosting, and security services;
- suppliers involved in managing the website or providing the requested services;
- other highway operators or entities involved in providing interconnected services, when necessary to respond to the user's request;
- administrative, judicial, or public security authorities, in cases provided for by law;
- external content providers voluntarily activated by the user, such as YouTube.

External entities processing personal data on behalf of the Controller are designated as data processors pursuant to Article 28 of the GDPR, where applicable.

Personal data is not disseminated.

Data Transfer to Third Countries

The use of Cloudflare services may involve the processing or transfer of personal data to countries outside the European Economic Area, including the United States of America.

Such transfers are carried out in compliance with Articles 44 et seq. of the GDPR, on the basis of applicable safeguard instruments, including adequacy decisions adopted by the European Commission and, where necessary, standard contractual clauses.

When the user chooses to view a video on the website, a connection with YouTube is activated, which may involve the transfer of personal data to countries outside the European Economic Area. This processing is carried out by YouTube as an independent controller and is not under the control of Autostrada del Brennero S.p.A. For more information, please refer to YouTube's privacy policy.

Retention Periods

Data contained in navigation and security logs, including security events made available through Cloudflare, are kept for 30 days. Statistical data collected via Matomo, after anonymization, are kept for two years. Data voluntarily provided by users via forms or e-mail are kept for the time necessary to manage and reply to the request.

Further retention is reserved where necessary to comply with regulatory obligations, follow up on requests from competent authorities, ascertain hypothetical crimes, manage cyber incidents, or protect the Data Controller's rights, including in court.

Rights of Data Subjects

Data subjects may ask the Controller, in the cases provided for by the GDPR, for:

- access to their personal data;
- rectification of inaccurate data or integration of incomplete data;
- erasure of personal data;
- restriction of processing;
- to object to processing carried out on the basis of legitimate interest, for reasons related to their particular situation;
- withdrawal of any consent given, without affecting the lawfulness of processing based on consent before its withdrawal.

Requests can be submitted:

- via e-mail to privacy@autobrennero.it;
- via fax to the number 0461 234976;
- via post to Autostrada del Brennero S.p.A., Via Berlino 10, 38121 Trento, Italy.

Right to Lodge a Complaint

Data subjects who believe that the processing of their personal data violates applicable regulations have the right to lodge a complaint with the Data Protection Authority (Garante) pursuant to Article 77 of the GDPR, or to appeal to the competent judicial authority pursuant to Article 79 of the GDPR.

Updates

This privacy policy may be updated as a result of regulatory, organizational, or technical changes regarding the website and the processing operations carried out.

Last update: October 2026