

Information regarding registration on the Highway to Procurement portal

Information pursuant to Article 13 of European Regulation no. 679/2016 ("GDPR") and applicable national legislation

Pursuant to Article 13 of European Regulation no. 679/2016 ("GDPR"), Autostrade per l'Italia S.p.A, in order to carry out the services allowing the operation of the Highway to Procurement portal and the computer applications required for the operation of the portal itself, hereby provides the information on the processing¹ of personal data that, with reference to your request for registration to the Highway to Procurement portal (hereinafter the "Portal") of Autostrade per l'Italia S.p.A. at the web address: <https://autostrade.bravosolution.com/web/login.html>, will be processed in compliance with the above mentioned regulation.

The processing of your data will be based on the principles of lawfulness and fairness, accuracy, relevance and transparency, guaranteeing the protection of your privacy and your rights.

1. DATA CONTROLLER

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

The Data Protection Officer (DPO) for Autostrade per l'Italia S.p.A. is domiciled for the purpose at the Company's registered office and can be contacted at the [PEC](mailto:dpo@pec.autostrade.it) (certified mail) address: dpo@pec.autostrade.it

With reference to the browsing data and logs automatically acquired by the computer system that regulates the computerised operation of the Portal (such as the IP address or the domain name of the computer used), the Data Controller is BravoSolution S.p.A., operating as "JAGGAER", as owner of the technology implemented in the Portal, with registered office in Bergamo, via Canonici Lateranensi 1, and operating office in Milan, via Rombon 11. JAGGAER's privacy policy is available at the following link: <https://www.jaggaer.com/trustcenter/>

2. TYPES OF PERSONAL DATA

Data acquired directly from the Data Subject during registration on the Portal:

Common: personal data (name, surname, address, date of birth, citizenship, marital status, profession), tax code, identity document, contact data (e-mail, telephone contacts).

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

- a) Purposes connected with registration on the Portal and related use; Nature of the provision (*Compulsory*); Legal basis (*Contractual, pursuant to art. 6(1)(b) of the GDPR*);
- b) Purposes connected with the operation and management of Autostrade per l'Italia S.p.A.'s own activities (e.g., Audit activities); Nature of the provision (*Compulsory*); Legal basis (*Contractual, pursuant to art. 6(1)(b) of the GDPR; Legitimate interest, pursuant to art. 6(1)(f) of the GDPR*).

¹ Any operation or set of operations performed with/without the aid of automated processes and applied to personal data or sets of personal data, such as collection, registration, organisation, structuring, storage, adjustment or correction, extraction, consultation, use, disclosure by transmission, dissemination or provision, alignment or combination, restriction, cancellation or destruction.

4. DATA PROCESSING METHODS

The personal data collected shall be processed and stored through IT and telematic tools and in computer and, if necessary, paper-based archives, in compliance with the measures set out in art. 32 of the GDPR.

Specifically, the processing shall be carried out mainly by automated tools, including through electronic tools for storing, managing and transmitting the data, implementing procedures strictly related to the purposes of the processing indicated above and always in compliance with the relevant regulations in force.

5. DATA RETENTION PERIOD

Data will only be kept 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

For the pursuit of the above-mentioned purposes, Personal Data will be processed by:

- persons tasked with the processing by the Data Controller and authorised to carry out processing operations within the framework of the aforementioned activities;
- Company BravoSolution Italia S.p.A. operating as "JAGGAER" (*pro tempore* Manager of the Portal), with registered office in Milan, Via Rombon 11, specifically appointed as Data Processor.

Moreover, your personal data may be processed by persons expressly authorised by Autostrade per l'Italia S.p.A. acting as Data Processors, pursuant to art. 28(3) of the GDPR. The updated list of data recipients is available from the DPO.

The personal data acquired may also be communicated to the judicial or administrative authorities or to other public bodies entitled to request them, in the cases provided for by law.

Disclosure: Your personal data will never be disclosed.

7. TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

Your personal data shall not be transferred outside Italy. However, please note that the Data Controller, should it be necessary, will be entitled to move the data for storage in servers located in the European Union and/or in non-EU countries. In this case, the Data Controller shall ensure that the transfer of the data to non-EU countries complies with the applicable legal provisions by entering into, if necessary, agreements ensuring an adequate level of protection and/or by adopting the standard contractual clauses provided for by the European Commission.

8. RIGHTS OF DATA SUBJECTS

Finally, please be informed that Articles 15-22 of European Regulation no. 679/2016 allow Data Subjects to exercise specific rights; Data Subjects may obtain from the Data Controller: access, correction, cancellation, restriction of processing, revocation of consent as well as portability of data concerning them.

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 kindly inform you that you may lodge a complaint with the Data Protection Authority.

9. AMENDMENTS TO THE POLICY

The Data Controller reserves the right to amend and update this Policy over time.

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