
PRIVACY NOTICE
pursuant to Art. 13 of the European Regulation 2016/679 on

**PROCESSING OF PERSONAL DATA THROUGH CAMERAS PLACED ALONG THE
MOTORWAY NETWORK**

This information notice is provided, pursuant to Article 13 of the EU Regulation 2016/679 (hereinafter, "**GDPR**"), with regard to the processing of personal data collected through a system of video cameras (hereinafter, the "**Cameras**") located along the motorway network owned by Autostrade per l'Italia S.p.A. (hereinafter, the "**Motorway Network**"), which extends for 2854.6 km and includes approximately 240 Tollbooths, 204 Service Areas and 104 Parking Areas. In particular, the Camera systems installed along the motorway sections are set up to film in long range and therefore do not allow the recognition of number plates and persons on board the vehicles, except in the case of accident management and the detection of illegal/irregular behaviour, for which it is possible to use additional functions only by authorised and authenticated personnel, and the Camera systems at the stations are set up to film only number plates during the transit phase on the track, except in the case of detection of illegal behaviour.

This camera system is functional to the prevention and detection of any unlawful and/or irregular behaviour, the management of traffic and related information, the management of motorway operations, and the efficiency of the services offered by Autostrade per l'Italia S.p.A..

1. Data controller

The data controller is Autostrade per l'Italia S.p.A. ("**ASPI**"), a company subject to management and coordination by Holding Reti Autostradali S.p.A., with registered office in Via A. Bergamini 50 - 00159, Rome, tax code, Rome Companies Register entry number and VAT no. 07516911000.

ASPI has appointed *pursuant to* Article 37 et seq. of the GDPR a Data Protection Officer ("**DPO**"), domiciled for the purpose at Via A. Bergamini 50, 00159, Rome, who can be contacted for any question concerning the processing of personal data by writing to the e-mail address dpo@pec.autostrade.it.

2. Type of data processed

The cameras are installed in such a way as to photograph the Motorway Network and the motor vehicles in transit on the Motorway Network, without, however, in any way permitting the recognition of persons on board the vehicles. More specifically, ASPI collects and processes the following data through photographic detection:

- i. the number plate of the vehicle where necessary during incident management or in the station transit phase;
- ii. other data related to the transit of the vehicle at the station (including date, time of entry/exit in/out of a motorway station).

The acquisition of motor vehicle data, carried out by means of a photographic survey, constitutes an 'indirect' processing of personal data, depending on the possible association of such data with the identity of the motor vehicle owner and other information associated with the data.

3. Purpose of processing

The personal data referred to in the preceding paragraph are processed by ASPI, in compliance with the provisions of the law and in accordance with the principles of necessity, minimisation, lawfulness, correctness, proportionality and transparency, exclusively for the following purposes:

- a) protection of the company's assets, including the protection of its assets, their economic value and the prevention and detection of any unlawful conduct to the detriment of the same ;
- b) prevention and detection of any unlawful and/or irregular behaviour , including those concerning toll payment , also pursuant to Article 176 of Legislative Decree 285/1992 ("*Highway Code*") and safety;
- c) traffic management, including incident resolution, monitoring of critical situations, monitoring of weather conditions, and any other activities to support the collection, management and continuous updating of traffic information;
- d) management of motorway operations, including the collection of tolls on sections under the responsibility of Autostrade per l'Italia S.p.A. and the management of related anomalies
- e) the streamlining of services offered by Autostrade per l'Italia S.p.A. .

Please refer to the following page <https://www.autostrade.it/it/privacy> to consult the disclosures prepared by Autostrade per l'Italia S.p.A. in relation to individual processing activities.

4. Legal basis of processing

The legal basis of the processing operations identified above is:

- i. for the purposes referred to in letters a) and b), the fulfilment of a legal obligation to which ASPI is subject, *pursuant to* Art. 6, letter c) GDPR and, in particular, compliance with the obligations provided for by the Highway Code regarding toll payment, as well as the legitimate interest of ASPI, pursuant to Art. 6, letter f), GDPR aimed at preventing theft, infringements and/or any irregularity;
- ii. for the purposes referred to in letters c), d), and e), as the case may be, the legitimate interest of ASPI, pursuant to Art. 6, lett. f), GDPR, aimed at obtaining information on the correct viability along the Motorway Network, to manage critical traffic situations and/or accidents in order to ensure the correct, safe and fast continuation and/or restoration of the viability, as well as the performance of a contractual obligation, pursuant to Article 6, letter b), GDPR, in relation to the management of motorway operations and the efficiency of related services".

5. Modalities of processing

Data processing is carried out with logic strictly related to the above-mentioned purposes, by means of computerised and telematic tools. In particular, photographic data processing is carried out by means of cameras installed at motorway stations and on intermediate portals ("in itinere" portals) located at strategic points on the motorway network.

All personal data are processed in compliance with the GDPR and current legislation, and in any case in such a way as to guarantee their security and confidentiality, to prevent unauthorised disclosure or use, alteration or destruction.

6. Storage times

Personal data are kept for the time strictly necessary to pursue the purposes mentioned in paragraph 3, in compliance with the principle of minimisation *pursuant to* Article 5.1(c) GDPR.

In particular, photographic images, acquired by means of the Cameras, are stored on a protected system and are deleted automatically, as a rule, within the day following their recording and in any case within 72 hours of their capture, unless they need to be viewed by the competent Authorities.

On the other hand, licence plate data are retained for a period of no longer than 48 hours from the time of their collection, unless further retention is required for the protection of any rights in court .

7. Data recipients

Data processing is entrusted, in individual operations, to employees and/or collaborators of ASPI, duly authorised and appointed. Any third parties delegated by ASPI will instead act as data processors pursuant to art. 28 of the GDPR ("*Processors*"), including the company EsseDiEsse S.p.A.. The full list of the persons appointed as Data Processors is available by contacting the DPO at the contact details indicated in paragraph 1 above.

ASPI may also communicate personal data to subjects, such as judicial authorities or police forces, to whom the communication is due by virtue of legal obligations. These subjects will act as autonomous data controllers.

Under no circumstances will personal data be disseminated.

8. Transfer abroad of personal data

Personal data are stored in servers located in Italy and within the European Union; no form of transfer of personal data outside the European Union is envisaged.

It is understood that, should it become necessary, ASPI will have the right to move the location of the servers outside Italy, to another EU country and/or to non-EU countries. In this case, ASPI assures as of now that any transfer of data outside the EU will take place in compliance with the applicable legal provisions by stipulating, if necessary, agreements which guarantee an adequate level of protection and/or by adopting the standard contractual clauses provided for by the European Commission.

9. Rights of the persons concerned

Finally, we would like to inform you that Articles 15-22 GDPR give data subjects the possibility to exercise specific rights; the data subject may obtain from the Data Controller: access, rectification, erasure, restriction of processing, revocation of consent, as well as the portability of the data concerning him/her. The data subject also has the right to object to the processing. If the right to object is exercised, 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 override the interests, rights and freedoms of the data subject.

These rights may be exercised by sending an appropriate request to the DPO to the e-mail address dpo@pec.autostrade.it, or by using the forms made available by ASPI on its website www.autostrade.it.

Finally, data subjects have the right to apply to the Italian Data Protection Authority (Piazza Venezia, 11, 00187 Roma (RM)), to assert their rights in relation to the processing of their personal data.

10. Amendments to this policy

ASPI reserves the right to make changes and updates over time, where necessary, to this information notice, by publishing it on its website www.autostrade.it. Users are therefore invited to keep the aforementioned site constantly monitored.

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