

INFORMATION ON VEHICLE GEOLOCATION SYSTEM

Autostrade per l'Italia S.p.A., with registered office in Rome, Via A. Bergamini 50, Tax Code and VAT no. 07516911000 (hereinafter referred to as "ASPI") and the Organisations of the Mechanical Rescue Service (hereinafter "SSM Organisations"), in agreement with ASPI, whose contact details are reported at the end of this information and published on the website of ASPI www.autostrade.it, in their capacity as independent Data Controllers, hereby inform that the motorway mechanical rescue service vehicles used by and belonging to the Organisations have been fitted with a tracking system operating through an On-Board System, designed as a device comprising the on-board unit of the satellite equipment with fixing bracket and wiring for fixed installation on the vehicle.

ASPI and the SSM Organisations adopted this system to ensure efficient and effective management of mechanical rescue operations along the motorway network managed by ASPI, so as to guarantee safety and assistance to users and levels of service compliant with the requirements of the regulations in force on the matter, of the Authorisation for the assignment of the management of mechanical rescue operations along the motorways managed by Autostrade per l'Italia S.p.A. and the related implementing Regulations.

Given the foregoing, and pursuant to and for the purposes of art. 13 of European Regulation 2016/679 (GDPR), we hereby provide specific information on the processing activities related to the aforementioned system.

1. TYPE OF DATA PROCESSED AND PURPOSE OF THE PROCESSING

This geolocation system collects the following data/information through a device installed on the vehicle:

- the geographical location of the vehicle;
- the serial number identifying the device;
- number plate of the rescue vehicle;
- the average and/or current speed;
- recording of engine events (switching on and off).

This data/information may be associated with data currently qualified as personal by the privacy legislation, such as the vehicle driver's identification data; therefore, ASPI and the Organisations will process such data in compliance with the provisions and guidelines of current privacy legislation and exclusively for the pursuit of the following purposes:

- a) ensure the safety and security of workers/operators on vehicles operated by the organisations;
- b) ensure safety and assistance to users involved in rescue operations on the motorway network under ASPI's responsibility;
- c) monitor the vehicle in order to optimise the rescue operation and meet logistical requirements in terms of the efficiency of the rescue fleet (e.g., proper planning of shifts and vehicle deployment, proper vehicle maintenance, etc.);
- d) ensure compliance with the requirements of the above-mentioned Authorisation, the Implementing Regulation and the relevant legislation in force.

2. DATA PROCESSING METHODS - RETENTION PERIOD

Personal data acquired by the tracking system are processed with the aid of IT and manual tools (use of paper-based documentation) in compliance with the principles of lawfulness, fairness, relevance and without exceeding the purposes for which they are collected.

All personal data and information processed are protected by appropriate security measures ensuring their confidentiality, integrity, accuracy, availability and updating. All personal data and information are automatically recorded on the servers of the service provider and retained only for the time 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 and eliminated after the term provided for by the relevant legislation in force, and in any case once the purpose for which such data are processed has ceased to exist, by means of deletion. The data provider shall extract the personal data acquired from the localisation system and transmit them to ASPI, which shall collect them on its server for the purpose of ASPI and the Organisations to consult and process them in order to carry out actions aimed at optimising the effectiveness of the organisation of rescue operations and vehicle management.

The Organisations shall access the aforementioned personal data, collected by ASPI as mentioned above, via a web interface, with access reserved for the Organisations themselves, and may extract and save them on their own company servers for the purpose indicated above.

All vehicles equipped with the localisation system are identified with a special notice placed on the vehicle in accordance with the requirements of the Data Protection Authority Order dated 04 October 2011.

3. DATA PROVISION

For the processing of personal data and exclusively for the aforementioned purposes, the Organisations have requested the consent of the Data Subjects, where necessary, in accordance with current privacy legislation. Data are automatically provided while driving the company vehicle.

4. DATA PROCESSORS

Personal data are processed by ASPI and the Organisations in compliance with the provisions of the privacy legislation in force at their own premises; within ASPI and the Organisations, only the persons tasked with the processing by the Data Controller and authorised to perform the processing operations within the scope of the aforementioned activities may acquire the personal data provided. The personal data acquired by the tracking system may be disclosed to third parties (third party companies) required to process the information for purposes connected with the vehicle tracking system, which are appointed as "Data Processors" for this purpose.

The full list of the persons appointed as Data Processors by ASPI is available from the ASPI Data Protection Officer, while the list of the Organisations' Data Processors (where appointed) is available at ASPI's registered office. Under no circumstances will personal data be disseminated.

5. RIGHTS OF DATA SUBJECTS

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 to the Data Protection Officer (DPO) at the address given below.

Data subjects may lodge a complaint with the Data Protection Authority.

6. DATA CONTROLLERS

- Autostrade per l'Italia S.p.A., with registered office in Rome, Via A. Bergamini 50;
- the Data Protection Officer of Autostrade per l'Italia S.p.A., pursuant to Articles 37, 38 and 39 of the GDPR, can be contacted at the PEC (certified mail) address dpo@pec.autostrade.it, in order to exercise the rights connected to the processing of personal data.

The Organisations of the Mechanical Rescue Service:

- Europ Assistance VAI S.p.A. with registered office in Milan, Via Crema 34; the Data Protection Officer can be contacted at the e-mail address UfficioProtezioneDati@europassistance.it or at the Data Protection Office located in Milan, Piazza Trento 8;
- ACI Global Servizi S.p.A. with registered office in Rome, Via Stanislao Cannizzaro 83/a; the Personal Data Protection Officer can be contacted by e-mail at rdp@aciglobalservizi.it;
- IMA Servizi S.c.a.r.l. with registered office in Sesto San Giovanni (MI), Piazza Indro Montanelli 20; the Personal Data Protection Officer is Mrs. Elisa Forlani;
- ESA Euro Service Assistance S.r.l. with registered office in Salerno, Via delle Calabrie 58; Personal Data Protection Officer is Mr. Antonio Sica.
- Inter Partner Assistance S.A. - General Representative for Italy with registered office in Rome, Via Carlo Pesenti 121; the Data Protection Officer can be contacted at the following e-mail address: privacy@axa-assistance.com

(Information to be included in the notice placed on the vehicle)



INFORMATION ON VEHICLE TRACKING SYSTEM

This summary information is provided pursuant to and for the purposes of art. 13 of European Regulation 2016/679 (GDPR) to vehicle's users.

Autostrade per l'Italia S.p.A., and the Organisations, in their capacity as independent Data Controllers, hereby inform that a geolocation system has been installed on the motorway rescue vehicle.

Data are automatically provided automatically during the transit of the company vehicle. Data provision is compulsory when getting into the vehicle; by a specific notice placed on the vehicle, Data Subjects are given advance information of the geolocation service.

The Full Information Notice containing the elements reported in art. 13 above, with particular regard to the purposes and storage, is published on the websites of Autostrade per l'Italia S.p.A. and the Organisations.

Independent data controllers are:

- Autostrade per l'Italia S.p.A., with registered office in Rome, Via A. Bergamini 50, Tax Code and VAT no. 07516911000, and the Data Protection Officer of Autostrade per l'Italia S.p.A., pursuant to Articles 37, 38 and 39 of the GDPR, can be contacted at the PEC (certified mail) address: dpo@pec.autostrade.it, in order to exercise the rights connected to the processing of personal data;

The Organisations of the Mechanical Rescue Service:

- Europ Assistance VAI S.p.A. with registered office in Milan, Via Crema 34, Tax Code 11989340150 and VAT no. 01333550323 and Personal Data Protection Officer can be contacted at the e-mail address UfficioProtezioneDati@europassistance.it or at the Data Protection Office located in Milan, Piazza Trento 8;
- ACI Global Servizi S.p.A. with registered office in Rome, Via Stanislao Cannizzaro 83/a, Tax Code and VAT no. 08242390014 and Personal Data Protection Officer can be contacted by e-mail at rdp@aciglobalservizi.it;
- IMA Servizi S.c.a.r.l. with its registered office in Sesto San Giovanni (MI), Piazza Indro Montanelli 20, Tax Code 10977590156, VAT no. 02420860963 and the Personal Data Protection Officer is Mrs. Elisa Forlani;
- ESA Euro Service Assistance S.r.l. with registered office in Salerno, Via delle Calabrie 58, Tax Code and VAT no. 03873480655 and Personal Data Protection Officer is Mr. Antonio Sica.
- Inter Partner Assistance S.A. - General Representative for Italy with registered office in Rome, Via Carlo Pesenti 121, Tax Code 03420940151, VAT no. 04673941003 and Personal Data Protection Officer can be contacted at the following e-mail address: privacy@axaassistance.com