





**PRIVACY NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 (“GDPR”)
concerning the processing of users’ personal data (“Users”)**



Dear Sir/Madam,




Autostrada Pedemontana Lombarda S.p.A., as Data Controller (hereinafter, the “**Company**” or the “**Controller**”), is required to provide you with certain information regarding the processing of personal data, as defined below, for the management of the motorway infrastructure and as a consequence of your relationship as a user (hereinafter the “**contractual relationship**”). The Company pays the utmost attention to the security and confidentiality of the personal data of the users (hereinafter, the “Users” or “User” in the singular) of the website <https://pedemontana.com/it> (hereinafter, the “Website”) and of any App (hereinafter, also simply the “App”) downloaded to use the services that can be purchased through the same Website (hereinafter, the “Services”), and wishes to provide them with information regarding the processing of their personal data.

	<p>DATA CONTROLLER</p>	<p>Autostrada Pedemontana Lombarda S.p.A. Tax Code/VAT No.: 08558150150 with registered office at Via Benigno Crespi no. 17 postcode 20159, Milan (hereinafter “Company” or “Controller”)</p>
	<p>CONTACT DETAILS OF THE CONTROLLER AND OF THE DATA PROTECTION OFFICER (“DPO”)</p>	<p> Registered letter with acknowledgement of receipt to the Company’s registered office  E-mail to the following address: dpo@pedemontana.com The Company has appointed a Data Protection Officer (“DPO”) who can be contacted at the following e-mail address: dpo@pedemontana.com</p>

	<p align="center">1. WHICH PERSONAL DATA CONCERNING YOU MAY BE COLLECTED</p>
	<p>In pursuit of the purposes indicated in paragraph 3 below, the following data suitable for identifying you are processed (collectively “Personal Data” or “Data”):</p> <p>common personal data,</p> <ul style="list-style-type: none"> • personal details, such as your first name and surname, date of birth, tax code, VAT number, identity document (Identity Card/Passport/Driving Licence); contact details, such as your address, your private telephone number, your e-mail address; • data relating to the vehicle (vehicle number plate, nationality, model, colour); • data relating to the motorway toll (including data from the electronic toll device); • images of the vehicle; • vehicle documents (vehicle registration document, company vehicle assignment letters, leasing handover reports, leasing/rental contract); • data relating to payment and invoicing methods (including IBAN and country of the bank account for refund requests); • data relating to the payment of the toll. <p>special categories of data: none</p>



	<p>2. <u>HOW YOUR DATA MAY BE COLLECTED</u></p> <p>Your Personal Data are collected by the Company directly from you, through your provision of them, or they may also be collected from third parties, for example by consulting registers kept by public bodies or equivalent bodies or under the control of the public authority on the basis of specific national legislation, where necessary and always in compliance with the data protection legislation in force. Furthermore, in relation to the toll refund service, the Company may receive personal data relating to third parties (by way of example: the employer's data contained in the company vehicle assignment letter; the data of the lessor or leasing company contained in the relevant contracts). Such data are processed in compliance with Article 14 of the GDPR, and the User undertakes to inform said third parties of the existence of this processing, making this Notice available to them.</p>
	<p>3. <u>FOR WHICH PURPOSES THE COMPANY PROCESSES PERSONAL DATA</u></p> <p>Through the Website, the App, and travel on our motorway sections, the Company collects certain personal data relating to Users, either voluntarily provided by them or collected during the normal operation of these and during the user relationship, which are processed for the purposes described below, including the possibility of purchasing the services offered (hereinafter, the "Services").</p> <p>The IT systems and software procedures responsible for the operation of the Website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of the Internet communication protocols. The Website also makes use of <i>cookies</i> and other tracking tools. Please refer to the notice available at the following <i>link</i> https://pedemontana.com/it/privacy, for further related information and to manage your preferences in this regard at any time.</p> <p>The processing activities carried out by the Company are set out below in summary form.</p>



 3. PURPOSES OF THE PROCESSING	 LEGAL BASIS OF THE PROCESSING AND NATURE OF THE PROVISION OF DATA	 DATA RETENTION PERIOD
The Data are processed for:	The processing is based on:	The Data are retained for a period of:
<p>A) Creation of the personal account.</p> <p>The Company collects certain personal data necessary to identify the User in order to create a profile allowing access to the restricted area, the management of account settings and the making of online payments, the viewing of transits associated with the number plate entered, and the purchase of services online.</p> <p>The creation of the account is also necessary for the management of toll refund requests and for the provision of the refund.</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR).</p> <p>The provision of the data is necessary because, failing this, the Company will not be able to provide access to the restricted area of the Website and the related services.</p>	<p>The Data collected, namely:</p> <ul style="list-style-type: none"> • First name and surname • E-mail • Associated vehicle number plate • Mobile telephone number (optional data, required only in the event of a refund request) • Tax code (optional data, required only in the event of a refund request) • IBAN in the name of the applicant (optional data, required only in the event of a refund request) • Country of the bank account (optional data, required only in the event of a refund request) • Identity document (optional data, required only in the event of a refund request) • Data relating to refunds received (optional data, only if refunds have been requested and received)



		They are retained until the account is deleted.
<p>B) Providing access to the App. To access the App, the Company collects certain personal data necessary to identify the User.</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR).</p> <p>The provision of the data is necessary because, failing this, the Company will not be able to provide access to the App</p>	<p>The Data collected, namely First name and surname, E-mail, Username, Password are retained until the account is deleted.</p>
<p>C) Performance of the Contract purposes relating to the payment of the toll</p>	<p>The performance of a contract to which the data subject is party (Article 6(1)(b) GDPR);</p> <p>The provision of Personal Data for such purposes is mandatory because, failing this, the Company will be unable to proceed with the contractual relationship.</p>	<p>The data collected, namely First name, Surname, Tax Code, Date of payment, Amount of payment, Invoices issued and payment receipts issued.</p> <p>The data are retained for the period necessary to manage the service, and in particular 10 years after the last transaction/journey, unless disputes arise.</p>
<p>D) Verification of transit through the acquisition of images of the vehicle</p>	<p>The performance of a contract to which the data subject is party (Article 6(1)(b) GDPR).</p> <p>The provision of Personal Data for such purposes is mandatory because, failing this, the Company will be unable to proceed with the contractual relationship.</p>	<p>The transit data, namely the photographs taken during travel on the motorway, are retained for 3 months from payment, with the exception of the electronic toll collection service, for which they are retained for 11 months.</p>
<p>E) Defending its own rights purposes relating to the management of and response to complaints and – in general – the need to defend rights and recover debts in the course of judicial, administrative or out-of-court proceedings and in the context of disputes arising in relation to the contractual relationship. Your Data may be processed by the Company to defend its rights or to take legal action, or also to bring claims against you or third parties.</p>	<p>The pursuit of the legitimate interest of the Controller, represented by the protection of its rights (pursuant to Article 6(1)(f) GDPR).</p> <p>No new and specific provision of data is required, since the Company will pursue this further purpose, where necessary, by processing the data collected for the purposes set out above.</p>	<p>The duration of the judicial, administrative or out-of-court proceedings, until the expiry of the time limits for bringing and/or challenging actions.</p>



<p>F) User assistance Purposes relating to the management of the user assistance service – back office.</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR).</p>	<p>The data will be retained for the time necessary to manage the request.</p>
<p>G) Purposes relating to the fulfilment of obligations under laws, regulations, national and EU legislation, as well as provisions issued by authorities legally empowered to do so. Purposes relating to the management of Toll Refund requests</p>	<p>The processing is carried out in the context of the legitimate interest of the Company (Article 6(1)(f) GDPR) to:</p> <ul style="list-style-type: none"> • guarantee users a high level of transparency of information on the conditions of use of the infrastructure; • improve the quality and reliability of travel information; • reduce information asymmetries between the operator and users; • ensure correct and consistent compliance with the transparency measures provided for by Resolution no. 132/2024 of the Transport Regulation Authority (ART); • determine the recognition of any refunds on the toll due, in line with the measures provided for by ART Resolution no. 211/2025; • service communications relating to the management of refund requests; • determine the impact of some of the quality indicators prescribed by ART in relation to the toll adjustment procedure <p>The provision of the data is necessary because, failing this, the Company will not be able to provide the refund service.</p>	<p>The Data, namely:</p> <ul style="list-style-type: none"> - Receipt of payment of the toll/reminder notice - Vehicle registration document - Company vehicle: vehicle assignment letter - Company leasing: leasing handover report → company - Leasing/rental: leasing/rental contract - Any vehicle handover report showing the date and time of the start/end of possession of the vehicle - Invoice for the electronic toll device - Electronic toll device data (OBU/PAN No.) - Identity document - Telephone number - E-mail address <p>They are retained for the purpose of managing the refund for a period of appropriate length, in any case not less than 24 months from the date of completion of the roadworks or, in the event of a complaint, from the date the complaint is submitted.</p>

 	<p>4. HOW WE KEEP YOUR PERSONAL DATA SECURE</p> <p>The processing of your Data will be based on the principles of fairness, lawfulness and transparency and will also be carried out by automated means designed to store, manage and transmit them. In any event, the processing will be carried out using tools suitable for ensuring security and confidentiality, through the use of procedures designed to prevent the risk of loss, unauthorised access, unlawful use and dissemination.</p>
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Furthermore, the Company, while ensuring the security and confidentiality of your Data, may also process them through:

- ✓ the video surveillance system with which the Company is equipped, installed in compliance with the applicable legislation, as described in the “Video Surveillance Notice” available near the cameras and placed before their field of action;

All personal data are stored on the Company’s protected IT devices (or appropriately archived paper copies) or on those of our suppliers, and are accessible and usable in accordance with our standards and security policies (or equivalent standards for our suppliers).

The Company will delete/anonymise your Data when the processing thereof is no longer necessary for the purpose for which they were collected, in accordance with the timescales indicated in the table in paragraph 3 above.



5. WITH WHOM WE MAY SHARE YOUR PERSONAL DATA

Your Data are accessible to the Company’s duly authorised employees who need to process them in accordance with the purposes indicated above, including system administrators.

In order to carry out certain Data processing activities, in any case strictly related to the management of the contractual relationship, the Company may communicate them to the following categories of external parties, who will process your Data as independent data controllers or as data processors, duly appointed by the Company in accordance with personal data protection legislation (depending on the role they play in relation to the processing). The Company may share your Personal Data, and only where necessary for the management of the contractual relationship, with:

- ✓ the company’s duly authorised employees;
- ✓ professional firms providing legal, tax and notarial advice for purposes strictly connected with the exercise of its economic activity;
- ✓ banks and credit institutions;
- ✓ debt collection companies;
- ✓ insurance companies;
- ✓ police forces and other public administrations, in fulfilment of obligations laid down by laws, regulations or European legislation; the tax authorities; the Transport Regulation Authority;
- ✓ IT support companies;
- ✓ companies providing recording and/or video surveillance services.

In any event, any access to your Data is limited to those persons who need to be aware of them in order to fulfil their work responsibilities.

Your Data will not be disseminated.



6. THE TRANSFER OF YOUR DATA OUTSIDE EUROPEAN TERRITORY

Your Personal Data will be processed mainly within the European Economic Area (EEA). However, the use of certain tools by the Company may entail, albeit on a residual basis, a transfer of the same to parties established in countries that do not belong to the European Union (EU) or the EEA (hereinafter the “**Third Countries**”), in particular in Switzerland. Such transfer is, in any event, carried out in compliance with the provisions of Chapter V of the GDPR.

Such external parties will process the personal data as independent data controllers or as data processors, duly appointed by the Company in accordance with personal data protection legislation (depending on the role they play in relation to the processing).

You may write to the Company at any time, using the contact details set out below, to ask which parties the personal data are transmitted to and to receive a copy of the safeguards adopted for the transfer.



7. RIGHTS OF THE DATA SUBJECT – COMPLAINT TO THE SUPERVISORY AUTHORITY

You have the right to obtain from the Company, subject to the existence of the legal basis underlying your request:

- a) access to the Data, as provided for by Article 15 of the GDPR;
- b) the rectification or completion of the Data in our possession deemed inaccurate, as provided for by Article 16 of the GDPR;
- c) the withdrawal of consent, pursuant to Article 7 of the GDPR, where the processing is based on that legal basis;
- d) the erasure of the Data for which the Company no longer has any legal basis for processing, as provided for by Article 17 of the GDPR;
- e) the restriction of the manner in which we process the Data where one of the cases provided for by Article 18 of the GDPR applies;
- f) a copy of the Data provided by you to the Company, in a structured, commonly used and machine-readable format, and the transmission thereof to another data controller (so-called portability), as provided for by Article 20 of the GDPR.

Right to object: in addition to the rights listed above, you have the right to object at any time, on grounds relating to your particular situation, to the processing of Data concerning you carried out by the Company in pursuit of its legitimate interest. The objection request must be sent to the following address dpo@pedemontana.com or sent, in paper form, by registered letter with acknowledgement of receipt addressed to the Company's registered office.

Should you exercise any of the aforementioned rights, it will be the Company's responsibility to verify that you are entitled to exercise it and to respond to you, as a rule, within one month.

The Company informs you that you may, at any time, withdraw any consent given for certain processing activities with future effect, by means of a simple written communication to be sent to dpo@pedemontana.com for the relevant purpose. Such withdrawal will not affect the lawfulness of processing carried out prior to it.

In the event of the exercise of the rights as described above, the Company will process any personal data provided by the User solely in order to respond to the request.

Should you consider that the processing of Data relating to you takes place in breach of the provisions of the GDPR, you have the right to lodge a complaint with the Garante per la protezione dei dati personali (the Italian Data Protection Authority), using the references available on the website www.garanteprivacy.it, or to bring the matter before the appropriate judicial authorities

The Data Controller

Autostrada Pedemontana Lombarda S.p.A.