

**NOTICE PURSUANT TO ARTICLE 13 AND 14 OF EUROPEAN REGULATION 2016/679 ('GDPR')
regarding the processing of users' personal data ('Users')**

Dear Sir/Madam,

Autostrada Pedemontana Lombarda S.p.A., in its capacity as Data Controller (hereinafter the '**Company**' or the '**Controller**'), is required to provide you with certain information concerning the processing of personal data, as defined below, for the management of the motorway infrastructure and in connection with your user relationship with the Company (hereinafter the '**Relationship**'). The Company places the utmost importance on the security and confidentiality of the personal data of users (hereinafter the 'Users', or individually the 'User') of the website <https://pedemontana.com/it> (hereinafter the 'Website') and of any application (hereinafter also referred to as the 'App') downloaded in order to access the services available through the Website (hereinafter the 'Services'). The Company therefore wishes to provide Users with information regarding the processing of their personal data.

	DATA CONTROLLER	Autostrada Pedemontana Lombarda S.p.A. TAX CODE/VAT NUMBER: 08558150150 with registered office at Via Benigno Crespi No. 17, 20159 Milan, (hereinafter the ' Company ' or the ' Controller ')
	CONTACT DETAILS OF THE CONTROLLER AND THE DATA PROTECTION OFFICER ('DPO')	 By registered mail with return receipt (A/R) to the Company's registered office  By email: dpo@pedemontana.com The Company has appointed a Data Protection Officer ('DPO'), who may be contacted at the following email address: dpo@pedemontana.com

	1. <u>WHAT PERSONAL DATA ABOUT YOU MAY BE COLLECTED</u>
	For the purposes set out in Section 3 below, the following data capable of identifying you are processed (jointly referred to as the 'Personal Data' or the 'Data'): ordinary Personal Data, • Personal identification data, such as your first name and surname, date of birth, Tax Code ('Codice Fiscale'), VAT Number ('Partita IVA'), and identification document (Identity Card/Passport/Driving Licence); contact details, such as your address, personal telephone number and email address; • Vehicle data (vehicle registration number, nationality, model, colour); • Motorway toll data (including electronic toll collection device data); • Images of the vehicle; • Vehicle documentation (vehicle registration certificate, company vehicle assignment letters, leasing handover reports, leasing/rental agreements); • Payment and billing information (including IBAN and country of the bank account for refund requests); • Toll payment data. special Categories of Personal Data: None



	2. <u>HOW YOUR DATA MAY BE COLLECTED</u> Your Personal Data are collected by the Company directly from you through your provision of such Data, or may also be collected from third parties, for example through consultation of registers maintained by public bodies or equivalent entities, or under the control of a public authority pursuant to specific national legislation, where necessary and always in compliance with the applicable data protection legislation. Furthermore, in connection with the toll refund service, the Company may receive personal data relating to third parties (by way of example: employer data contained in a company vehicle assignment letter; data relating to the lessor or leasing company contained in the relevant agreements). Such data are processed in accordance with Article 14 GDPR, and the User undertakes to inform such third parties of the existence of this processing activity by making this Privacy Notice available to them.
	3. <u>FOR WHAT PURPOSES THE COMPANY PROCESSES PERSONAL DATA</u> Through the Website, the App and your use of our motorway infrastructure, the Company collects certain personal data relating to Users. Such data are either voluntarily provided by the Users themselves or collected in the ordinary course of operation of the services and within the framework of the user relationship. The data are processed for the purposes described below, including enabling the purchase and provision of the services offered (hereinafter the ' Services '). The IT systems and software procedures used to operate the Website acquire, during their normal operation, certain personal data whose transmission is inherent in the use of Internet communication protocols. In addition, the Website makes use of cookies and other tracking technologies. Please refer to the Privacy Notice available at the following link: https://pedemontana.com/it/privacy for further information and to manage your preferences at any time in this regard. The processing activities carried out by the Company are summarised below.

 3. PURPOSE OF PROCESSING	 LEGAL BASIS FOR PROCESSING AND NATURE OF THE PROVISION OF DATA	 DATA RETENTION PERIOD
The Data are processed for:	Processing is based on:	The Data are retained for a period of:
A) Creation of a personal account. The Company collects certain personal data necessary to identify the User in order to create a profile enabling access to the restricted area, management of account settings, the execution of online payments, the viewing of journeys associated with the registered vehicle licence plate, and the purchase of online services. The creation of an account is also necessary for the management and payment of toll refund requests.	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). The provision of Data is necessary, as failure to provide such Data will prevent the Company from granting access to the restricted area of the Website and the related services.	The Data collected, namely: • First name and surname • Email address • Associated vehicle licence plate number • Mobile phone 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 paid) The Data are retained until the account is deleted.
B) Providing access to the App. In order to access the App, the Company collects certain personal data necessary to identify the User.	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). The provision of Data is necessary, as failure to provide such Data will prevent the Company from providing access to the App.	The Data collected, namely: First name and surname, Email address, Username, Password are retained until the account is deleted.
C) Performance of the Contract purposes relating to toll payment	Performance of a contract to which the data subject is party (Article 6(1)(b) GDPR); The provision of Personal Data for these purposes is mandatory, as failure to provide such Data would prevent the Company from managing the Relationship.	The Data collected, namely: First name, Surname, Tax Code, Date of payment, Amount paid, Invoices issued and payment receipts issued. The Data are retained for the period necessary for the management of the service and, in particular, for 10 years following the last transaction/journey, unless litigation proceedings arise.
D) Verification of transit through the acquisition of vehicle images	Performance of a contract to which the data subject is party (Article 6(1)(b) GDPR). The provision of Personal Data for these purposes is mandatory, as failure to provide such Data would prevent the Company from managing the Relationship.	Transit data, namely photographs taken during motorway passage, are retained for 3 months following payment, with the exception of the electronic toll collection service, for which they are retained for 11 months.
E) Protection of rights purposes related to the management of and response to complaints and, more generally, the protection of rights and debt recovery in judicial, administrative or out-of-court proceedings and in the context of disputes arising in connection with the Relationship. Your Data may be processed by the Company in order to protect its rights, bring legal proceedings, or assert claims against you or third parties.	The pursuit of the Controller's legitimate interest, represented by the protection of its rights (Article 6(1)(f) GDPR). No new or specific provision of Data is required, as the Company shall pursue this additional purpose, where necessary, by processing the Data already collected for the purposes set out above.	For the duration of the judicial, administrative or out-of-court proceedings and until the expiry of the limitation periods for bringing and/or appealing legal actions.



F) User assistance Purpose of managing the user assistance service – back office.	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).	The Data will be retained for the time necessary to manage the request.
G) Purposes related to compliance with legal obligations, regulations, national and European legislation, as well as provisions issued by authorities legally empowered to do so. Purposes related to the management of Toll Refund Requests	Processing is carried out on the basis of the Company's legitimate interest (Article 6(1)(f) GDPR) in order to: • ensure a high level of transparency for users regarding the conditions governing the use of the infrastructure; • improve the quality and reliability of travel information; • reduce information inconsistencies between the infrastructure operator and users; • ensure proper and consistent compliance with the transparency measures provided for by ART Resolution No. 132/2024; • determine entitlement to any toll refunds due, in accordance with the measures set out in ART Resolution No. 211/2025; • service communications related to the management of refund requests; • determine the impact of certain quality indicators prescribed by ART in connection with the toll adjustment procedure The provision of Data is necessary, as failure to provide such Data will prevent the Company from providing the refund service.	The Data, namely: - Toll payment/payment reminder receipt - Vehicle registration certificate - Company vehicle: vehicle assignment letter - Company lease: vehicle handover report from the leasing company to the company - Lease/rental: lease/rental agreement - Any vehicle handover report showing the date and time of commencement and termination of the vehicle assignment/use - Electronic toll collection device invoice - Electronic toll collection device data (OBU/PAN No.) - Identity document - Telephone number - E-mail address The Data are retained for the purpose of managing refund requests for an appropriate period of time and, in any event, for no less than 24 months from the date of completion of the roadworks or, in the event of a complaint, from the date on which the complaint is submitted.



4. HOW WE KEEP YOUR PERSONAL DATA SECURE



Your Data will be processed in accordance with the principles of fairness, lawfulness and transparency and may also be processed through automated means designed to store, manage and transmit them. In all cases, processing will be carried out using appropriate tools and measures designed to ensure security and confidentiality through procedures aimed at preventing the risk of loss, unauthorised access, unlawful use and disclosure.



Furthermore, in order to ensure the security and confidentiality of your Data, the Company may also process such Data through:

- ✓ the video surveillance system with which the Company is equipped, installed in compliance with applicable legislation, as described in the 'Video Surveillance Privacy Notice', which may be consulted in the vicinity of the cameras and is displayed before entering their field of operation;

All personal data are stored on the Company's protected IT systems (or in appropriately archived hard-copy records) or on those of our service providers, and are accessible and usable in accordance with our security standards and policies (or equivalent standards adopted by our service providers).

The Company shall delete and/or anonymise your Data when their processing is no longer necessary for the purpose for which they were collected, in accordance with the retention periods set out in the table in Section 3 above.



5. WITH WHOM WE MAY SHARE YOUR PERSONAL DATA

Your Data may be accessed by duly authorised employees of the Company who need to process them for the purposes indicated above, including system administrators.

For the performance of certain Data processing activities, which are in any event strictly related to the management of the Relationship, the Company may disclose your Data to the following categories of external parties, who shall process your Data either as independent data controllers or as data processors duly appointed by the Company in accordance with applicable data protection legislation (depending on the role they perform in relation to the processing). The Company may share your Personal Data, and only where necessary for the management of the Relationship, with:

- ✓ duly authorised employees of the Company;
- ✓ professional firms providing legal, tax and notarial consultancy services, for purposes strictly connected with the exercise of the Company's business activities;
- ✓ banks and credit institutions;
- ✓ debt collection agencies;
- ✓ insurance companies;
- ✓ police authorities and other public administrations, in compliance with obligations established by laws, regulations or European legislation; the Tax Administration; the Transport Regulation Authority ('Autorità di Regolazione dei Trasporti');
- ✓ IT support and assistance companies;
- ✓ companies providing registration and/or video surveillance services.

In any event, access to your Data is limited to those persons who need to know such Data in order to fulfil their professional responsibilities.

Your Data will not be disclosed to the public.



6. TRANSFER OF YOUR DATA OUTSIDE THE EUROPEAN TERRITORY

Your Personal Data will be processed primarily within the European Economic Area ('EEA'). However, the use of certain tools by the Company may, albeit on a residual basis, involve the transfer of such Data to entities established in countries outside the European Union ('EU') or the EEA (hereinafter, the '**Third Countries**'), in particular Switzerland. Any such transfer shall, in all cases, be carried out in compliance with the provisions of Chapter V of the GDPR.

Such external entities shall process the Personal Data either as independent data controllers or as data processors duly appointed by the Company in accordance with the applicable data protection legislation (depending on the role they perform in relation to the processing).

You may contact the Company at any time, using the contact details provided below, to request information regarding the entities to which Personal Data are transferred and to obtain a copy of the safeguards adopted in relation to such transfers.



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

You are entitled to obtain from the Company, where the legal requirements for your request are met:

- a) access to your Data, as provided for in Article 15 GDPR;
- b) the rectification or completion of Data held by us that are considered inaccurate, as provided for in Article 16 GDPR;
- c) the withdrawal of consent, pursuant to Article 7 GDPR, where processing is based on such legal basis;
- d) the erasure of Data for which the Company no longer has any legal basis for processing, as provided for in Article 17 GDPR;
- e) the restriction of the manner in which we process your Data where one of the circumstances set out in Article 18 GDPR applies;
- f) a copy of the Data you have provided to the Company in a structured, commonly used and machine-readable format, and the transmission of such Data to another data controller (so-called 'data portability'), as provided for in Article 20 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 your Data by the Company where such processing is carried out for the purposes of pursuing its legitimate interests. Any request to exercise the right to object must be sent to the following email address: dpo@pedemontana.com or submitted in hard-copy form by registered mail with return receipt (A/R) addressed to the Company's registered office.

Should you exercise any of the above-mentioned rights, the Company shall be responsible for verifying that you are entitled to exercise such rights and, as a general rule, shall respond to your request within one month.

The Company hereby informs you that you may, at any time, withdraw any consent you may have granted for specific processing activities, with effect for the future, by means of a simple written communication sent to dpo@pedemontana.com in relation to the relevant processing purpose. Such withdrawal shall not affect the lawfulness of any processing carried out prior to the withdrawal.

Where the rights described above are exercised, the Company shall process any personal data provided by the User solely for the purpose of responding to the relevant request.

Should you consider that the processing of your Data infringes the provisions of the GDPR, you have the right to lodge a complaint with the Italian Data Protection Authority, using the contact details available on the website www.garanteprivacy.it, or to bring proceedings before the competent courts

The Data Controller

Autostrada Pedemontana Lombarda S.p.A.