

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR)

Website/App of the Motorway Concessionaires Sector

(Initial implementation phase – information content)

1. Data controllers and joint controller agreement

The participating motorway concessionaires (hereinafter collectively referred to as the ‘Concessionaires’ or the ‘Joint Controllers’) have entered into a joint controller agreement pursuant to Article 26 of Regulation (EU) 2016/679 (hereinafter the ‘GDPR’), in relation to the joint management of the sector-specific Website and App (‘Website/App’) referred to in Measure 5 of the Resolution of the Transport Regulatory Authority (hereinafter ‘ART’) No. 132/2024, as subsequently amended and supplemented.

Pursuant to this agreement, the Joint Controllers jointly determine the purposes and means of processing the personal data collected via the Website/App during this initial implementation phase. The agreement governs their respective responsibilities regarding compliance with the obligations arising from the GDPR, in particular with regard to the exercise of data subjects’ rights. The single point of contact for data subjects – pursuant to Article 26(1), second sentence, of the GDPR – is:

Contact point	Information
Email address	privacy@flowais.it
Postal address	Panetta Consulting, Piazza Colonna 355, 00187 – Rome (RM)

Please note that communications and/or requests relating to the processing carried out by the Joint Controllers in connection with the operation of the sector-specific website/app may be sent to the above contact point. Any other communications concerning the processing carried out by each concessionaire must be addressed to the respective contact points and/or to the Data Protection Officers (DPOs) appointed by each of them, as indicated in the individual privacy notices published on their respective websites.

For greater clarity and transparency, it is specified that the joint controllers are the following companies:

- Autostrade per l'Italia S.p.A.
- Società Autostrade Alto Adriatico S.p.A.
- Milano Serravalle - Milano Tangenziali S.p.A.
- Autostrada Brescia-Verona-Vicenza-Padova S.p.A.
- CAV - Concessioni Autostradali Venete S.p.A.
- Autostrada dei Fiori S.p.A.
- Autostrada del Brennero S.p.A.
- S.A.T.A.P. S.p.A. - A4 Torino - Milano
- Ivrea-Torino-Piacenza S.p.A.
- Autostrada Asti-Cuneo S.p.A.
- Raccordo Autostradale Valle d'Aosta S.p.A.
- Autovia Padana S.p.A.
- Società Autostrade Valdostane S.p.A.
- Concessioni del Tirreno S.p.A.

- Società Autostrada Tirrenica S.p.A.
- Società Autostrada Ligure Toscana p.a.
- Strada dei Parchi S.p.A.
- Società di Progetto Brebemi S.p.A.
- Tangenziale Esterna di Milano S.p.A.
- SITAF - Società Italiana Traforo Autostradale del Frejus S.p.A.
- Tangenziale di Napoli S.p.A.
- Salerno-Pompei-Napoli S.p.A.
- Autostrada Pedemontana Lombarda S.p.A.

2. Data Protection Officer (DPO)

Each Concessionaire has appointed a Data Protection Officer where required under Article 37 of the GDPR. The contact details of the DPOs for the individual Joint Controllers can be found on their respective official websites and in the relevant privacy notices.

3. Purposes of processing and legal basis

During the initial implementation phase, the sector-specific Website/App contains solely informational content, in accordance with Measures 3, 4 and 5 of the Resolution No. 132/2024 issued by ART, as subsequently supplemented and amended. There is no user registration function, nor any provision for personalised interaction or the submission of complaints.

The personal data collected, as further specified in paragraph 4 below, is limited and relevant to the purposes set forth below. Specifically, it concerns only browsing and usage data related to the sector-specific Website/App, as well as data provided by data subjects should they decide to report a technical failure or malfunction of the sector-specific Website/App:

Purposes	Legal basis (Art. 6 GDPR)
To ensure the proper technical functioning of the sector-specific Website/App (e.g. session management, device compatibility, reports of technical problems and malfunctioning)	Article 6(1)(f) – legitimate interest of the Joint Controllers in providing the information service
Collection of aggregated statistical data on the use of the sector-specific website/app (e.g. sections visited, number of visits) to improve its content and functionality	Article 6(1)(f) – legitimate interest of the Joint Controllers in improving the service
Compliance with the regulatory obligations set out in ART Resolution No. 132/2024 (Measures 3, 4 and 5)	Article 6(1)(c) – legal obligation

The pursuit of the legitimate interest has been assessed by balancing the Joint Controllers' interests against the rights and freedoms of data subjects, taking into account the purely technical and non-intrusive nature of the data processed.

4. Categories of personal data processed

At this stage, the sector-specific Website/App does not require registration, the creation of user profiles or interactions involving the voluntary provision of personal data by the user. The data processed consists exclusively of browsing and usage data relating to the sector-specific Website/App, generated automatically by IT systems at the time of use, including IP address, characteristics of the operating system and browser of the device used to access the content, log and security data, and cookies.

No data belonging to special categories within the meaning of Article 9 of the GDPR is processed, nor is any data relating to criminal convictions, offences and related security measures within the meaning of Article 10 of the GDPR.

Certain personal data, such as first name, last name, and email address, may be processed if a user decides to report a technical issue and/or the malfunctioning of the relevant website or app by voluntarily filling out the appropriate form available online.

5. Recipients and disclosure of data

Browsing data may be disclosed to or made accessible to the following categories of recipients, to the extent strictly necessary for the purposes indicated:

- **IT service providers:** entities providing hosting services, technological infrastructure and maintenance of the Website/App, acting as Processors and/or sub-processors pursuant to Article 28 of the GDPR;
- **Competent authorities:** public authorities, supervisory bodies (including the Transport Regulatory Authority – ART) and judicial authorities and/or law enforcement agencies, in the cases provided for by law or upon specific request;

The data is not disclosed. The joint controller agreement sets out the procedures for coordination between the Concessionaires regarding the handling of data subjects' requests and any data breaches. An extract from the agreement, containing this information, may be requested by sending a specific request to the contacts indicated in paragraph 1 of this notice, specifying the nature of the request.

6. Transfer of data to third countries

Data processing activities relating to the sector-specific Website/App are normally carried out within the territory of the European Union. Should data need to be transferred to third countries or international organisations for technical reasons relating to cloud service or infrastructure providers, such transfer will take place exclusively in accordance with the safeguards provided for in Articles 44 et seq. of the GDPR (adequacy decision, standard contractual clauses or other appropriate safeguards).

7. Data retention period

Browsing data is retained for the time strictly necessary to fulfil the purposes indicated and, in any event:

- technical system logs: for a period not exceeding 24 months from collection, unless a longer retention period is necessary for the establishment, exercise or defence of a legal claim;
- aggregated statistical data: retained in anonymous form, without any time limit, as they cannot be traced back to identifiable natural persons;
- data related to reports of technical issues are retained for the period necessary to review, manage, and close the ticket opened by the user.

At the end of the retention period, technical log data, as well as data relevant to the reports of technical issues and/or malfunctioning are deleted or irreversibly anonymised.

8. Rights of data subjects

To the extent that the data processed relates to identified or identifiable natural persons, data subjects may, where the conditions are met, exercise the following rights pursuant to Articles 15–22 of the GDPR:

- the right of access to one's personal data (Article 15 of the GDPR);
- the right to have inaccurate data rectified (Article 16 of the GDPR);
- the right to erasure ('right to be forgotten') (Article 17 of the GDPR);
- the right to restriction of processing (Article 18 of the GDPR);
- the right to object to processing (Article 21 of the GDPR), in particular where processing is based on legitimate interests;
- the right to data portability, in the cases provided for in Article 20 of the GDPR.

Requests may be sent to the single point of contact indicated in paragraph 1.

9. Right to lodge a complaint with the supervisory authority

Should the data subject consider that the processing of their personal data is in breach of the GDPR, they have the right to lodge a complaint with the Italian Data Protection Authority, with its registered office at Piazza Venezia, 11 – 00187 Rome. Website: www.garanteprivacy.it – Certified email (PEC): protocollo@pec.gpdp.it

Finally, this is without prejudice to the data subject's right to bring a claim before the ordinary courts.

10. Use of cookies and similar technologies

The sector-specific website/app may use technical cookies or similar technologies that are strictly necessary for the functioning and use of the service (e.g. session cookies). No profiling or tracking cookies are used for advertising purposes. For detailed information on the types of cookies that may be used, please refer to the Cookie Policy accessible via the sector-specific website/app.

11. Updates to this policy

This policy may be updated following the implementation of new features on the sector-specific Website/App (including, in future, the functions for registration, lodging complaints and requesting compensation and/or refunds provided for by ART Resolution No. 132/2024, as subsequently amended and supplemented), changes to the applicable legislation or changes to the methods of processing. Updates will be made available on the Sector Website/App

When new features are activated that involve the processing of additional categories of data or the pursuit of new purposes, an updated privacy notice will be published on the sector-specific Website/App.

Date of last revision: 29/07/2026

The Motorway Concessionaires as Joint Controllers