

PRIVACY POLICY - USERS
*pursuant to Articles 13 and 14 of EU Regulation 2016/679
and the applicable privacy provisions*

Foreword

Pursuant to and for the purposes of Italian Legislative Decree 196/2003 as amended ('Privacy Code') and EU Regulation 2016/679 on the protection of personal data ('Regulation') as well as any other applicable national and/or EU provisions and/or regulations, on the protection of personal data, Autostrada Pedemontana Lombarda S.p.A., with registered office in Via Benigno Crespi no.17, 20159 Milan (MI), in its capacity as Data Controller ('Company' or 'Data Controller'), hereby informs you that the personal data ('Data') provided by you during the establishment and/or execution of the contractual relationship or otherwise acquired as part of our Company's activity, may be processed in compliance with the following.

1. PURPOSE AND LEGAL BASIS OF PROCESSING

The Data Controller collects and processes personal data relating to you in the context of the existing contractual relationship with the Company, such as:

- name, surname, tax code and/or VAT number, place and date of birth, physical address, telephone number, e-mail
- vehicle data (vehicle registration number, nationality, model, colour)
- motorway toll data
- vehicle images
- payment methods details

The information processed is compulsory and necessary to correctly execute the contractual relationship between you and our Company. Below we explain the purposes for which your personal data ('Data') are processed, as well as the legal basis for their processing.

The Company processes the Data for:

- I. provision of services related to the management of motorway infrastructure, including e-mail communications related to service provision for registered users;
- II. activities necessary for calculating the motorway tolls using the 'Free Flow' system;
- III. activities necessary for toll payment (including the activation and management of the 'Conto Targa' and 'Ricaricabile' services) and for the recovery of unpaid tolls;
- IV. responding to any reports/requests and performing activities related to and necessary to their management and execution (e.g. verification and reimbursement of payments made);
- V. complaint management and feedback;
- VI. control and monitoring of the services provided online and on platforms managed by the Data Controller and made available to you also as a result of the activities carried out on behalf of the Data Controller (access to reserved area, websites, etc.). Moreover, computer data will be processed for the implementation of procedures aimed at the detection and notification of personal data breaches (data breach). The legal basis for the processing is the performance of activities dependent on the established contractual relationship as well as the fulfilment of legal obligations (detection and notification of data breach events);
- VII. purposes related to the fulfilment of legal obligations, regulations, national and EU legislation and provisions issued by authorities empowered to do so by law.

The legal basis for processing the Data for the purposes referred to in points (i), (iii), (iv) and (v) is Article 6(1)(b) of the GDPR. Furthermore, the legal basis for the processing for the purpose referred to in point (ii) is Article 6(1)(f) of the GDPR. Finally, the legal basis for processing the Data for the purposes referred to in points (vi) and (vii) is Article 6(1)(c) of the GDPR. Your data may also be collected from third parties such as for example IT service providers; and data concerning you may be obtained by consulting lists held by public entities or equivalent, or under the control of public authority according to specific national regulations.

2. NATURE OF DATA PROVISION AND CONSEQUENCES OF FAILURE TO PROVIDE DATA

For the execution of the purposes listed above, the processing of the Data is mandatory and failure to provide such Data will result in the inability to execute the service contract between you and the Company.

3. CALL CENTER PHONE CALL RECORDING

In order to ensure the quality of the service provided and to carry out checks in the event of complaints or disputes, in full compliance with Resolution No. 132/2024 of the Transport Regulation Authority (ART) and the applicable privacy regulations, phone calls to the toll-free Info and Viability contact centre will be recorded. The data provided by users through these audio recordings fall under the definition of Personal Data as outlined above.



The processing of Personal Data related to the recording of users' phone calls to the toll-free Info and Viability contact centre, made available by the Company, is aimed at the proper management of the Service, with specific reference to the obligations arising from the user's use of the Service and relating to the functions institutionally exercised by the Company. Specific purposes of this data processing include:

- the quantification and allocation of toll fees, including the acquisition of information for managing the relationship with accredited toll service providers;
- communications with users regarding toll transactions and any related requests (payment and credit recovery), managed by the Company as the Concessionaire of motorways A36, A59, and A60, including through the toll-free Info and Viability contact centre;
- ensuring the quality of the service provided to users, as required by ART Resolution No. 132/2024, as well as handling complaints and potential disputes;
- activities related to the prevention and detection of violations concerning the obligation to pay toll fees, as per Article 176 of Legislative Decree 285/1992 and subsequent amendments;
- communications with users, including through the dedicated toll-free Info and Viability contact centre, regarding safety, traffic conditions, and the use of the Company's infrastructure;
- compliance with administrative, fiscal, and legal obligations to which the Company is generally subject;
- the proper fulfilment of obligations arising from the Service provided to users, including via the website and the toll-free Info and Viability contact centre;
- interventions on the website.

Legal bases for the processing of recorded calls to the toll-free Info and Viability contact centre include:

User consent: explicitly provided by the user pursuant to Article 6(1)(b) of the GDPR, in connection with the recording of phone calls to the toll-free number made available by the Company for the purposes outlined above.

Data related to recorded phone calls will be retained for a maximum period of 24 months from the date of receipt of the call.

4. CATEGORIES OF RECIPIENTS TO WHOM THE DATA MAY BE DISCLOSED

The Data may be disclosed, for the above-mentioned purposes, to the following categories of recipients: Credit Institutions, Lawyers and Law Firms, Public Bodies, IT service and support companies, Auditing and Balance Sheet Certification Companies, Debt Collection Companies and Associated Companies for administrative and accounting purposes and for the service-related purposes assigned to them as indicated in paragraph 1.

5. DATA TRANSFER

For the purposes stated above, the transfer of personal data to recipients referred to in paragraph 3, located in countries outside the European Economic Area, specifically Switzerland, is envisaged. With regard to such transfer, pursuant to Chapter V of the GDPR, the relevant adequacy decision of the European Commission shall apply.

6. METHODS OF PROCESSING PERSONAL DATA

The processing of data is carried out through paper-based or IT systems by authorised and trained internal personnel. They are allowed access to your personal data only to the extent necessary for the performance of processing activities that concern you. The Data Controller periodically checks the tools through which your data are processed and the security measures provided for them, and ensures that they are constantly updated.; The Data Controller also verifies, through authorised entities, that no personal data are collected, processed, filed or stored for which processing is not required. Furthermore, the Data Controller verifies that the data is stored with the guarantee of integrity and authenticity and that it is used for the purposes of the actual processing activities.

7. STORAGE OF PERSONAL DATA

Data will be processed for the entire duration of the contractual relationship with our Company. Afterwards, they will be retained in compliance with the standard limitation periods identified by the Italian Civil Code or by specific legal



provisions, for administrative purposes and/or to assert or defend a right or legitimate interest, and will be deleted when the purposes for which they were collected no longer apply. For computer data, the storage period depends on the risk presumed and/or detected and the detrimental consequences thereof, subject to measures to anonymise the data or to limit their processing. In any case, the data must be kept (starting from the knowledge/detection of the danger event or data breach) for the time necessary to notify the Data Protection Authority of the data breach detected through the procedures implemented by the Data Controller and in any case to remedy it.

8. RIGHTS OF DATA SUBJECTS

We inform you that you may exercise, in the cases expressly provided for by the Regulation, the rights referred to in Articles 15 and following of the Regulation and in particular:

- request confirmation that the processing of Data is ongoing and, if so, request access to information related to the processing from the Data Controller;
- request the correction of inaccurate or incomplete personal data;
- request the deletion of the Data from the Data Controller;
- request the restriction of processing;
- request to receive, in a commonly used and machine-readable format, the Data concerning you or request the direct transmission of such Data to another controller, where technically feasible (so called “data portability”).

The Data Controller shall do so without delay and, at the latest, within one month following the reception of your request. The time limit may be extended for a period of two months if necessary, considering the complexity and number of requests received by the Controller. In such cases, the Controller shall inform you within one month of receiving your request, and notify you about the reasons of such delay. The aforementioned rights may be exercised by sending a request to the Company at the following e-mail address: privacy@pedemontana.com.

Right to object: For reasons relating to your particular situation, you may object at any time to the processing of your personal data if it is based on a legitimate interest or if it concerns the processing of personal data whose supply is subject to your consent. You can do so by sending your request to the Data Controller at the following address: privacy@pedemontana.com. You have the right to the deletion of your personal data if there is no overriding legitimate reason that outweighs the reason for your request, and in any case if you have objected to the processing.

Right to lodge a Complaint: Without prejudice to any other action in the administrative or judicial office, you may lodge a complaint with the competent supervisory authority, or with the authority that performs its tasks and exercises its powers in Italy where you have your habitual residence or work, or if different, in the Member State where the violation of Regulation (EU) 2016/679 occurred.

9. DATA PROTECTION OFFICER

The *Data Protection Officer*, hereinafter “DPO” can be contacted at the dedicated address dpo@pedemontana.com.

Data Controller

Autostrada Pedemontana Lombarda S.p.A.