

**Policy and consent request for the processing of personal data
pursuant to art. 13 of Italian Legislative Decree 196/2003 and art. 13 of Regulation (EU) no. 2016/679**

Dear Sir/Company,

In compliance with the obligations provided by and pursuant to art. 13 of Italian Legislative Decree no. 196 of 30.6.2003 (hereinafter referred to as the "Privacy Code") and art. 13 of Regulation (EU) 2016/679 (hereinafter referred to as "GDPR"), we hereby inform you that the company

AUTOVIA SRL

Registered offices: Via Brennero, 140 - 38121 - Trento (Italy)
Tax code, VAT no. IT03200690372, EAI no: Bologna 272829

will process personal data regarding you that have been or will be communicated to us by you or others. The processing of personal data will be carried out in compliance with the regulations in force and under the following conditions.

1. Purpose of processing

The Data Controller will process personal and identifying data (for example name, surname, company name, address, telephone number, email, bank and payment details, hereinafter referred to as "personal data" or also "data"), communicated by yourself during the conclusion of contracts for services provided by the Data Controller.

2. Purpose of processing

Your personal data are processed:

- A) without your express consent (art. 24 letters a), b) and c) of the Privacy Code and art. 6, letters b) and e) of the GDPR), for the following service purposes:
- Performance of contracts for the services provided by the Controller.
 - Fulfilling of pre-contractual, contractual and tax obligations deriving from existing relations with you.
 - Fulfilling of obligations resulting from laws, regulations, European Community rules or orders from the Authorities (such as for example with regards to anti-money laundering measures).
 - Exercising of the rights of the Data Controller, for example the right to legal defence.
- B) exclusively with your specific and distinct clear consent (arts. 23 and 130 of the Privacy Code and art. 7 of the GDPR), for the following Marketing Purposes:
- To send you, via email, mail and/or SMS and/or telephone, newsletters, commercial communications and/or advertising materials regarding products or services offered by the Data Controller, as well as customer satisfaction surveys regarding the quality of services.
 - To send you, via email, mail and/or SMS and/or telephone, commercial and/or promotional communications from third parties (e.g. business partners, insurance companies, etc.).

3. Methods of processing

Your data is processed through the operations indicated in art. 4 of the Privacy Code and in art. 4, paragraph 2 of the GDPR and are, in detail: the collection, recording, organisation, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of the data. Your personal data are subject to printed, electronic and/or automated processing.

The Data Controller will process the Personal Data for the time necessary to fulfil the purposes indicated above and in any case for no longer than 10 years from the termination of the relationship for Service Purposes and for no longer than 2 years from the collection of Data for Marketing Purposes.

4. Provision of data

The provision of data is:

- a) compulsory for the fulfilment of purposes related to obligations in accordance with laws or other binding regulations.
b) necessary for the proper establishment and continuation of the relationship with you.

Any refusal to provide the aforementioned data, although undoubtedly legitimate, could jeopardise the proper execution of the relationship with our Company and, in particular, could make it impossible for us to fulfil your orders, as well as to carry out the provision of the services requested and the related invoicing.

5. Communication and disclosure of data

Communication externally to the company of personal data collected for the purposes set out in point 2 may only take place where:

- a) said disclosure is mandatory in order to ensure compliance with the requirements of the law or other binding regulations.
b) said communication is mandatory in order to ensure the proper establishment or continuation of the business relationship with you.

Personal data collected for the achievement of the aforementioned purposes may be communicated to the extent of their specific competence, to public and private entities, natural persons and/or legal entities, and for commercial purposes and/or the management of information and/or payment systems, including external parties carrying out specific tasks on behalf of our Company. In particular, the data may be communicated to the following categories of subjects: commercial network, banking institutions and companies specialising in payment management, legal and consultancy firms, subjects entrusted with the auditing of our company's financial statements, public authorities or administrations for legal compliance, Italian and foreign suppliers, financing and transportation companies, third parties entrusted with the quality control of the logistic-commercial flow. Your data will not be distributed.

6. Transfer of data abroad

Personal Data are held on servers located at the Data Controller's premises, within the European Union. It is understood that the Data Controller, where deemed necessary, also has the right to move these servers outside the European Union. In this case, the Data Controller guarantees as of this moment that the transfer of data outside the European Union will occur in compliance with applicable legal provisions, following stipulation of standard contractual clauses set out by the European Commission.

7. Rights of the data subject

As Data Subject, you have the rights referred to in article 7 of the Privacy Code and article 15 of the GDPR and, specifically, the right:

- to obtain confirmation of the existence or not of personal data that concern you, even if said data have not yet been recorded, and to obtain their communication in an intelligible form.
- to obtain information regarding:
 - a) the origin of the personal data.
 - b) the purposes and methods of processing.
 - c) the logic applied where processing is carried out with the use of electronic means.
 - d) details of the identity of the Controller, data processors and the designated representative pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1 of the GDPR; e) the entities or categories of entity to whom or which the personal data may be communicated and who or which may have knowledge of said data in their capacity as designated representative(s) in the State territory, data processor(s) or person(s) responsible for processing.
- to obtain:
 - a) the updating, the rectification or, where necessary, the integration of the data; the erasure, the transformation into anonymous form or the blocking of data processed in violation of the law, including data for which conservation is no longer necessary for the purposes for which they were collected or subsequently processed.
 - b) certification to the effect that the operations pursuant to letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
- to either totally or partially oppose:
 - a) for legitimate reasons, the processing of personal data which concern you, even if pertinent to the purpose of collection; b) the processing of personal data which concern you for the sending of advertising material or direct sales or for the carrying out of market research or communications of a commercial nature, through the use of automated calling systems without the intervention of an operator, via email and/or traditional marketing methods via telephone and/or mail. It should be noted that the data subject's right to object, set out in the point above,
 - b) for purposes of direct marketing through the use of automated systems, is also valid for traditional modalities and in any case the Data Subject has the right to state their partial or total opposition. Therefore, the Data Subject may decide to receive communications solely through traditional methods or rather solely through automated communications or neither of the two types of communication.

Where applicable, you also have the rights specified in articles 16-21 of the GDPR (the right to rectification, the right to be forgotten, the right to restriction of processing, the right to data portability, the right to object) as well as the right to lodge a complaint with the Italian Data Protection Authority.

8. Data Controller and Processors

We also confirm that the Data Controller is the undersigned company, represented by its legal representative, with registered offices in Via Brennero, 140 - 38121 - Trento (Italy). The Data Processor for the data concerning you, domiciled for this purpose at the Company's registered offices, is the Customer Service Manager - Certified email: autoviapec@legalmail.it or registered mail with acknowledgement of receipt to the aforementioned registered offices.

9. Consent to processing

Lastly, we would like to inform you that the provision of your consent to the processing of your personal data in the manner and for the purposes set out above is optional. If you refuse to give your consent, our Company may not process your personal data, but only use them in compliance with the obligations provided for by law or other existing regulations, with the possible consequences described in point 4 above.

As you are aware, current legislation provides that the processing of personal data is carried out with the consent of the person concerned, except in cases of exclusion specifically indicated by the law itself. For this reason, we kindly ask you to promptly return the attached consent request form to us as acknowledgement of receipt of the information in this policy and as an expression of consent to the processing of personal data.

Yours faithfully,