



Personal Data Protection Compliance Statement

Plose Sistem Service S.p.A., with registered offices at Via Vittorio Veneto 69, 39042 Bressanone, BZ, Italy, with Taxpayer Identification Code and VAT Code 01178970214 (hereinafter, “Data Controller” or “Plose”), wishes to inform you that the personal data you have voluntarily made available to the Data Controller shall be processed in compliance with Regulation EU No. 2016/679 (hereinafter, “GDPR”).

The Data Controller therefore invites you to carefully read the new compliance statement on the protection of your personal data, provided in accordance with Article 13 and in the manner provided for in Article 12 (*in a concise, transparent, intelligible and easily accessible form, using clear and plain language*) of the GDPR.

1. Data Subject to Processing

The data we ask you to provide within the scope of business agreements, are collected for the purpose of offering customized solutions for the payment of taxes and tolls on transit routes, road tunnels, bridges, for the purchase of fuel, as well as for the related management of VAT and excise duties’ refund.

The Data Controller processes the personal data you will provide when subscribing to the Plose services for purposes connected to the management of the contractual relationship, and to discharge accounting, fiscal, or legal obligations.

The personal data (hereinafter, the “Data”) communicated by the Data Subject to the Data Controller fall within the following category:

Company name, registered office, tax code and VAT number, email address of your company, as well as personal and contact details of Legal Representative and workers.

2. Purposes and Legal Grounds for Processing

Your data shall be processed:

A) In accordance with Article 6, letter b), and c) of the GDPR, for the following Service Purposes:

- Managing your subscription to the Plose services, so that you may use all the services you should request;
- Implement economic, communication, or commercial initiatives deemed compliant with the Company’s business purpose as stated in its by laws;
- Discharge administrative - accounting obligations and any obligation of law or regulation, including European Community regulations, or orders issued by the Authorities;
- Communicate news and information to our providers on the contractual and business relationships in place, in order to provide our services without any discontinuity in terms of operations;
- Provide operative assistance to customers, including post-sale.

B) In accordance with Article 6, letter f), for the purposes of the legitimate interest pursued by Controller or for the exercise of its rights also in legal proceedings. C) After you have provided your express and separate consent, acquired pursuant to Article 7 of the GDPR, for the following Purposes:

- Sending you, via ordinary e-mail or via phone, informative and commercial communications, including promotional material, which may be sent in the form of newsletters;
- Registration with initiatives created by the Data Controller, such as, by way of example, trade fairs and events that may be relevant to your business.

The legal grounds for such processing fall within those listed under Article 6 of the GDPR, including the above mentioned: performance of contractual and pre-contractual obligations, legal obligations, and consent of the Data Subject.

3. Nature of the Provision of Data and Consequences for Refusing to Provide Certain Data

The provision of the data required to pursue the purposes as per heading A) and B), paragraph 2, is “mandatory”, and, where you should refuse to provide such data, Plose shall be unable to provide the services, or to inform you on any variations to the service selected.

The provision of the data required to pursue the purposes as per heading C), paragraph 2, is “optional”, meaning that a refusal to provide such data shall exclusively entail that you may not be informed of new services/commercial initiatives. You may also decide to freely revoke the consent granted by communicating your intention revoke such consent through the email address resp_privacy@plose.it, it being understood that the legality of the processing performed based on the consent granted prior to such revocation shall not be affected. In any case, revoking your consent to the processing of the optional data you have provided shall not affect the purposes for which you have provided the mandatory data.

4. Methods and Duration of the Processing

The Data are processed in paper, electronic, and/or computer form for the time that is strictly required to attain the purposes for which they were collected, and for the purpose of any legal obligation (or, where applicable, up until the Data Subject submits a request for their erasure or revokes their consent to the processing thereof).

The processing of your Data is performed through the operations indicated under Article 4, No. 2, of the GDPR, meaning any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

5 Retention Period

Your personal data, subject to processing for the purposes above described, will be retained for the whole duration of the contracts which have been concluded for the provision of our services and, subsequently, for the following storage terms:

- 10 years for the fulfilment of tax and administrative obligation envisaged by law or regulations;
- 5 years for the possible attainment of commercial scopes.

5. Security

In consideration of the nature, the subject matter, and the purposes of the processing of personal data, the Data Controller and the Data Processor implement technical and organisational measures that are suitable

to guarantee a level of security against the risk of loss, dissemination, abuse, or alteration of Data, including:

- a) Pseudonymisation and encryption of personal data;
- b) Capacity to ensure, on a permanent basis, the confidentiality, integrity, availability, and resilience of the processing services and systems;
- c) Capacity to promptly restore the availability and access to the personal data in case of physical or technical incident;
- d) A procedure to regularly test, check, and assess the effectiveness of the technical and organisational measures implemented to guarantee the security of the processing.

6. Scope of the Disclosure of Data

Please note that the Data you have provided or acquired over the course of the performance of the agreement may be made accessible for the purposes detailed under paragraphs 2:

- a) to employees and collaborators of the Data Controller, in their capacity as persons in charge of the processing and/or internal processors and/or system administrators;
- b) Other companies belonging to the 360 Payment Solutions Group which, as Co-Controllers, determine, jointly with Controller, means and purposes of the processing that are carried out in the performance of the business activities referred to "*Joint Controller Agreement*";
- c) to third-party companies that perform outsourced activities on behalf of the Data Controller in their capacity as external processors, and, thus, to external professionals whose legal, fiscal, or accounting services are requested or to credit institutions.

7. Transfer of personal data abroad

Please note that the Data you have provided or acquired over the course of the performance of the agreement may be accessible also:

- to each Country in the European Union and on servers located in the European Union;
- to non-European third-party companies, but in that case shall be required an adequate level of protection, subject to the European Commission's decision.

With specific reference to transfer of personal data to countries outside the UE, we furthermore inform you that:

- in the absence of a decision of adequacy, eventual transfers of personal data to non-European Countries shall be possible solely if the Controller and the Processor supply an adequate level of protection with binding corporate rules and standard data protection clauses; in the absence of a decision of adequacy or other measures, the data transfer to third Countries shall be done solely if the Data Subject has given consent or in the cases referred to art. 49, chapter V of GDPR.

8. Rights of Data Subjects

In your capacity as Data Subject, you may freely exercise the rights detailed under Article 15 of the GDPR, which are:

- Obtain from the controller confirmation on the existence of personal data that concern you, including when not yet recorded, and obtain the communication thereof in intelligible form;
- obtain the indication of : a) the source of the personal data: b) the purposes and the methods of processing; c) the logic applied in case of processing carried out through electronic tools; d) the identification data of the Controller, the Processors, and the supervisor appointed under Article 3,

paragraph 1, of the GDPR; e) the recipients or the categories of recipients to whom the personal data may be disclosed or who may learn of such data in their capacity as appointed representatives in the territory of the State, or as Processors or persons in charge of processing;

- obtain: a) the updating, rectification, or, where of interest, the completion of incomplete Data; b) the erasure, anonymisation, or blocking of the data that was processed in violation of the law, including the data which storage is not required with respect to the purposes for which the data was collected or subsequently processed; c) a statement that the operations as per letters a) and b) have been brought to the attention of, including with respect to their content, to those to whom the data were communicated or disclosed;
- object, in whole or in part, a) on legitimate grounds, to the processing of personal data that concern you, including where pertinent to the purpose for which they were collected; b) to the processing of the personal data that concern you for the purpose of sending advertisement material or direct sale or to perform market surveys or for the purpose of marketing communication, via e-mail and/or traditional marketing techniques such as phones and/or traditional mail.

Where applicable, you shall also have the rights listed under Articles 16-21 of the GDPR (Right to rectification; Right to be forgotten; Right to restriction of processing; Right to data portability; Right to object), and the right to submit complaints to the Supervisory Authority.

8. How to Exercise Your Rights

You can exercise the rights as per paragraph 7 above at any time, by writing to resp_privacy@plose.it.

9. Data Controller and Data Processors

Our contact details are:

Plose Sistem Service S.p.A., Data Controller, may be contacted at Via Vittorio Veneto 69, 39042 Bressanone, BZ.

The Data Subjects may also request, at any time, and without any formalities, to receive the list of the third-party recipients who may have access to the Data in their capacity as external processors or independent data controllers.

Furthermore, the Data Subjects may also request to have knowledge, at the same conditions mentioned in the previous subparagraph, of *Joint Controller Agreement* referred to paragraph 7, point b) of the present informative.