

**PRIVACY NOTICE REGARDING THE “SECURE PARK” PARKING AREA
AND RELATED BOOKING APP
pursuant to art. 13 of EU Regulation 2016/679 of 27 April 2016
General Data Protection Regulation**

Secure Park Area and App Information

Dear User,

pursuant to Article 13 of EU Regulation 2016/679 *General Data Protection Regulation* (“**GDPR**”) we provide you with the following information on the processing of your personal data relating to the use of the parking areas called “Secure Park” managed by the company Concessioni Autostradali Venete - CAV S.p.A. (the “**Parking Area(s)**”) and the related Booking Application (the “**App**”).

1 - Identity and contact details of the Data Controller

The Data Controller is the company Concessioni Autostradali Venete – CAV S.p.A., with registered office in Via Bottengi no. 64/A, 30175 Marghera (VE), Italy, Tax Code and P.IVA 03829590276, e-mail privacy@cavspa.it.

2 - Categories of personal data processed

The following personal data will be processed:

- Registration data and data related to your personal account in the App (mobile phone number, first and last name, gender, email address, license plate of the vehicle that will use the “Secure Park” area, company, selected area, selected language). You can change your account details at any time by accessing the “Edit personal details” section within the App;
- Log data relating to the use of the App (connection data and reports relating to any malfunctions);
- Data relating to the use of the Parking Area and related services (e.g. vehicle license plate, date and time of access and exit from the Area; date, time and identification of the access building within the Parking Area, e.g. toilets or refreshments; code for the use of the QR code for access to the facilities and premises of the Area).

The Area will be under video surveillance for security purposes and to protect CAV's assets. The specific information on the processing of personal data through video surveillance systems is available on the signs installed in the Area and on the CAV website.

3 - Purpose and legal basis of the processing of personal data

Your personal data will be processed, in compliance with current legislation on the protection of personal data, for the following purposes:

- a) Registration and creation of your personal account to enable you to use the App;
- b) Booking, access and use of the Parking Area and the services offered by CAV (e.g. parking for a maximum period of 3 days, access and use of the toilets and the refreshment area) and management of the related contractual relationship with CAV in line with the provisions of the Regulations for the use of the Area (e.g. by sending service communications in the event of closure or other circumstances relating to the Area or management of any reports from you).
The legal basis of the processing is the need to execute the contractual relationship deriving from your use of the App and the Area managed by CAV (pursuant to Article 6, paragraph 1, letter b) of the GDPR).
- c) Safe and secure management of the Area;
The legal basis of the processing is the need to comply with the legal and regulatory obligations incumbent on CAV as manager of the safe and protected parking area (pursuant to Article 6, paragraph 1, letter c) of the GDPR).
- d) Protection of CAV's rights in the event of accidents or offences (e.g. damage to CAV's facilities, failure to spontaneously release the Area at the end of the parking period or in case of need communicated by CAV, civil or criminal offences, etc.)
The legal basis for the processing is CAV's legitimate interest in protecting its rights (Article 6, paragraph 1, letter f) of the GDPR). We consider this interest to be legitimate and balanced against your rights and freedoms.

4 - How we process your personal data

Personal data will be processed mainly using computerized, telematic and digital means in compliance with current legislation and, in any case, in such a way as to guarantee the security and confidentiality of the data and prevent their unauthorized disclosure or use, alteration or destruction.

Please note that the use of the App is mandatory in order to book parking at the Secure Park. We ask you to provide all the data required as necessary to allow us to process your booking and enable you to use our services.

5 - Personal data retention period

Your personal data will be stored for the time strictly necessary to pursue the purposes indicated in paragraph 3 of this privacy notice. At the end of the retention period, the data will be destroyed or anonymized. Specifically, the data will be stored according to the following criteria.

Purpose	Data retention
a)	Data necessary for configuring and using the App will be stored for 6 months after the last booking. After this time, your account will be deleted but you can create a new one at any time. The log data of the use of the App will be kept for 6 months.
(b) and (c)	Data relating to access to the Area and use of the related services (e.g. license plate data and access to refreshment and toilet areas) will be stored for 7 days from the vehicle's exit from the Area at the end of the booked parking period.
d)	In the event of litigation (e.g. in case of damage, tort or accident, etc.), the data will be stored until the dispute with the Company has been resolved.

6 - Recipients of personal data

Within the scope of the purposes indicated above, the following subjects may have access to your data (within the limits of their respective competences): (i) supplier and developer of the App; (ii) suppliers of softwares used for the purpose of detecting vehicle license plates entering/leaving the Area; (ii) suppliers of services or software instrumental to the Company's technological infrastructure; (iv) Law enforcement Agencies and Judicial authorities. The details of the subjects acting as Data Processors pursuant to Article 28 of the GDPR can be requested by writing to privacy@cavspa.it.

Within the Company, your personal data will be processed (limited to their respective area of competence) by persons authorized to process data pursuant to art. 29 of the GDPR and to Article 2-quaterdecies of the Italian Legislative Decree no. 2003/196.

7 - Extra-EU data transfers

For the purposes indicated above, your personal data will not be transferred to Countries outside the European Union.

8 - Rights of Data Subjects

By sending an email to the address privacy@cavspa.it you may at any time exercise - within the limits of what is applicable to the case in question - the rights referred to in Articles 15 to 22 of the GDPR, including: (i) obtaining confirmation as to whether or not personal data concerning you is being processed; (ii) obtaining access to your personal data and the information indicated in Article 15 of the GDPR; (iii) obtaining the rectification of inaccurate personal data concerning you without undue delay or the integration of incomplete personal data; (iv) obtaining the erasure of personal data concerning you without undue delay; (v) obtaining the restriction of the processing of personal data concerning you; (vi) being informed of any rectification or erasure or restriction of processing made in relation to personal data concerning you; (vii) receiving or transmitting to a different data controller in a structured, commonly used and machine-readable format the personal data concerning you. Furthermore, pursuant to art. 21 of the GDPR, you will have the right to object at any time, for reasons related to your particular situation, to the processing of personal data concerning you. You can find the full list of your rights on www.garanteprivacy.it.

9 - Complaint to the Supervisory Authority

Please note that, if you believe that the processing of your data infringes the provisions of the GDPR, you may always lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it), or with the Data Protection Authority of the Country in which you habitually reside, work or the place where the alleged infringement occurred.

10 - Data Protection Officer (DPO)

The Data Protection Officer designated by the Company pursuant to Article 37 of the GDPR can be contacted at the e-mail address dpo@cavspa.it.