



Società per azioni con socio unico soggetta all'attività di direzione e coordinamento Atlantia S.p.A.
Capitale Sociale € 26.000.000,00 interamente versato
Codice Fiscale e n. di iscrizione al Registro delle Imprese di Roma 09771701001
REA - ROMA n.1188554 - P.I. 09771701001 - Sede Legale: Via Bergamini, 50 00159 Roma

LETTERE : VIA A. BERGAMINI, 50 – 00159 ROMA
TELEF. : 06.4363.1
TELEFAX : 06.4363.4090
WEBSITE : www.telepass.com
PEC : telepass@pec.telepass.it

Telepass S.p.A. – App Information notice – Go by Telepass

This information sheet is provided pursuant to Article 13 of Regulation (EU) 679/2016 (“**GDPR**”) for persons accessing and using the “Go by Telepass” app (the “**Go by Telepass**” “**App**”) to benefit from a package of services allowing the payment of motorway tolls or charges for parking in affiliated facilities within the Italian, French, Spanish and Portuguese network; any third party website or other application to which you may be redirected by the App is therefore considered excluded.

This document supplements the content of the privacy information sheet provided by Telepass at the time of signing the service contract and provides details on the specific processing operations underlying the functioning and use of the App by the user.

1. WHO IS THE DATA CONTROLLER

Telepass S.p.A., with registered office at via A. Bergamini, 50, Rome, in the person of its *pro tempore* legal representative, is the processor of your personal data (hereinafter also referred to as the “**Data Controller**” or “**Telepass**”).

2. PERSONAL DATA DEFINITION, PURPOSES OF THE PROCESSING AND THE RELEVANT LEGAL BASIS

“**Personal data**” means any information making it possible to identify a natural person, directly or indirectly, in this case, you, when you are browsing on Go by Telepass (the “**Data**”).

In particular, Telepass processes the following Data:

- (i) Your contact details (forename and surname);
- (ii) Your invoice;
- (iii) The IP, the URL used;
- (iv) Browsing data;
- (v) Browsing history;
- (vi) Geographical coordinates;
- (vii) List of trips/journeys made;
- (viii) Information on the IT environment used by you (*e.g.* ID, make and model, last update made, and data on the operating system used by your device);
- (ix) Information on the performance and use of the App (*e.g.* network coverage, interactions with the App sections and number of accesses made);
- (x) Data voluntarily supplied by you in that context to benefit from the European Service.

Moreover, in certain circumstances, you can access Go by Telepass via the TouchID functionality. However, biometric data collected through this authentication procedure is only registered by the operating system (*e.g.* IOS or Android) of the mobile device used by you and will not be processed by Telepass in any way. Note that this function may be disabled at any time by changing the settings on your smartphone.

a) Download and installation

Firstly, in order to satisfy the user’s request, Telepass will process the Data to allow you to download and correctly install the App on your mobile device.

b) Using the Telepass Pay per Use service via the App

In order to execute the contract arranged by you, Telepass will use your Data to allow the correct operation of the App and the resulting use of Telepass Pay per Use which can be accessed via the various sections of Go by Telepass, i.e.:

- One section in which you will be able to view information on the Telepass Pay per Use service;
- A link to the reserved area, within which you will be able to view the list of trips/journeys made and the limit available to you.

Some services available to you via the App (e.g. payment of tolls and parking in the affiliated facilities) need the device through which you access Go by Telepass to be located. For that purpose, you can authorize the App, using the various procedures of your smartphone's operating system (e.g. IOS or Android), to collect the Data referred to in point (vi). You can disable this functionality at any time by accessing the settings of your mobile device, in which case it will not be possible to use the service for which your location needs to be identified.

Within the scope of using and browsing on Go by Telepass, the Data Controller collects some of your Data indirectly, including the IP addresses used by your device to connect to the Internet, the URI (*Uniform Resource Identifier*) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the sizes of the file obtained in response, the digital code indicating the status of the response given by the server (completed, error, etc.) and other parameters concerning your operating and IT environment. This information is used for statistical purposes and to check the correct functioning of the App.

Telepass will also process your mobile device's IP to direct you to the acceptance flow in a language that you understand.

c) Sending promotional and advertising messages

In the cases detailed in the wording of the privacy information sheet provided by Telepass at the time of signing the relevant contract and on your express, specific consent, the Data Controller may also use your Data to send you commercial or promotional information messages on the entire range of products marketed by the Data Controller, by the companies forming part of its business group or by third party companies, with which it may conclude partnership agreements, in sectors such as: fuel, restaurants, insurance services, consumer credit and other sectors aimed at the travel and motorists' segment (e.g. repairs, maintenance, car dealers and mobility sharing).

d) Personalization of offers

Again on your consent and in line with the information provided in the privacy information sheet provided by the Data Controller at the time of signing the contract for Telepass services, Telepass may then process your Data for profiling purposes. These activities enable us to carry out statistical and market survey and research intended to create/define your profile and/or your personality, by analysing your tastes, your preferences, habits, possible requirements and/or consumer choices. In that way, Telepass can offer you products, services, promotions and/or discounts more in line with your requirements, at the same time avoiding disturbing you with messages you may consider intrusive or annoying.

e) Management maintenance and optimisation of Go by Telepass

Finally, your Data may also be processed to carry out activities connected with the management, administration, development and optimization of the App.

Telepass collects and processes the Data you provide by sharing videos, photographs and comments relating to the use of the App with the aim of improving the overall customer experience. Specifically, Telepass uses an analytics system - which can only be activated “on request” by the user - which allows to resolve any malfunctions and anomalies of the App.

Due to the analytics, the Data Controller will be able to compile statistics and reports on the App performance and, if necessary, improve its functionality (*e.g.* : system crash resolution).

* * *

Providing the Data referred to in points (i), (ii) and (vi) is absolutely voluntary. However, if you refuse to do so, Telepass will be unable to satisfy your requests.

The collection of the Data referred to in points (iii), (iv), (v) and (viii), on the other hand, is implicit in browsing on the App.

The Data collected by Telepass via the App could also be processed for the purposes described in the privacy information sheet provided by the Data Controller on signing the relevant contract, to which reference is made for further details.

In any event, we undertake to ensure that the information collected and used is appropriate for the purposes described and does not give rise to an invasion of your private life.

3. DISCLOSURE OF YOUR DATA

As an integral part of the processing activities, your Data could be disclosed to the companies suitably appointed as data processor by the Data Controller which provide information services for the maintenance, management and development of the functionalities of the App for Telepass.

4. WHERE DO WE TRANSFERT YOUR DATA

The server farm where we physically manage your Data is situated within the territory of the European Union.

In general, your Data will not be sent and/or communicated to third parties situated outside the European Economic Area.

In any case, if that should happen in the future, Telepass undertakes to inform you before taking such measures.

Where appropriate, the security of such transfer will be governed by recourse to standard contractual clauses adopted by the European Commission with Decision 2010/87/EU and any subsequent amendments or, alternatively, based on a adequacy decision made by the European Commission, or based on binding corporate rules and/or any other instrument permitted by the legislation, always observing the legislation applicable at that time (*e.g.*: Privacy Shield).

5. HOW LONG DO WE KEEP YOUR DATA FOR

We process your Data for the time strictly necessary to enable you to benefit from the services offered by Telepass.

However, we reserve the right to keep your log-in and log-out data and any information on your use of the App for a longer period, if that is strictly necessary to monitor and combat any crimes or other unlawful behaviour committed via the App (*e.g. hacking, etc.*).

With regard to the processing carried out for marketing and profiling purposes, the storage period indicated in the privacy information sheet provided by Telepass at the time of signing the relevant contract still applies.

6. YOUR RIGHTS AS DATA SUBJECT

You, in your capacity as interested party, are entitled to:

- **access** your Data and request a copy thereof;
- request the **rectification** or **update** of your Data, if it is incorrect or incomplete;
- in the event of certain circumstances, request the **erasure** of Data concerning you or the **restriction** of the processing of your Data;
- request the **portability** of data;
- in the event of certain circumstances, **object to** the processing of your Data.

Moreover, particularly with regard to marketing and profiling purposes, you may **revoke** any consent required for the processing of your Data, if provided, at any time.

Finally, you may **file a complaint**, regarding the processing of your Data, to the *Autorità Garante della protezione dei dati personali* [Italian Data Protection Authority].

For more information on your rights, you may contact Telepass at privacy@telepass.com or, alternatively, you may write to the DPO at the following address:

Responsabile della protezione dei dati – *Data Protection Officer* (DPO)

c/o Telepass S.p.A.

Via Alberto Bergamini, 50

00159 – Rome

Email: DPO@telepass.com

Technological development and, in particular, the optimization of Go by Telepass might make it necessary to update this information sheet. We will therefore ensure that we inform you of any changes to the processing of your Data via the institutional channels, including the website and the App itself.