



## Personal Data Information Briefing

Dear Client

### PRIVACY POLICY

**Subject: Information briefing in accordance with article 13 of the EU Regulation no. 679/2016 concerning the protection of physical persons with regard to the processing of personal data.**

EU Regulation no. 679/2016 (General Data Protection Regulation) lays down rules for the protection of persons with regard to the processing of personal data.

In compliance with the indicated regulation, APCOA PARKING ITALIA SPA processes personal data in accordance with the principles of propriety, legality and transparency and the protection of your confidentiality and your rights.

**The Data Controller is:** APCOA PARKING ITALIA S.P.A.

Registered office: Via Renzo Zanellini, 15 – 46100 Mantua (MN)

VAT No. 01578450205 – Tax Code 01176050217

For further information, please send an email to the address: [privacy@apcoa.it](mailto:privacy@apcoa.it)

### OUR PRIVACY POLICY IN BRIEF



**Personal data** are information concerning an identified or identifiable physical person ("**person concerned**"). APCOA process the personal data of clients in order to implement the **contract** or because the **law** so orders in certain cases.



APCOA PARKING ITALIA SPA is the "**Data Controller**" and has taken suitable technical and organisational measures to **protect the personal data** of clients.



"**Processing**" consists of operations carried out with computer instruments or on paper in order to gather, organise and safeguard personal data.



In processing personal data, APCOA is assisted by a number of "**data managers**" and "**authorised internal subjects**", who receive specific training to ensure the confidentiality and privacy of clients.



Personal data may also be **communicated** to public and private organisations in order to implement the contract or because the law so orders in certain cases.



To obtain **further information** on the processing of personal data carried out by APCOA PARKING ITALIA SPA, please read the complete information briefing or visit our website [www.apcoa.it](http://www.apcoa.it)

## OUR PRIVACY POLICY IN DETAIL

### 1. WHAT IS THE USUAL LIFE CYCLE OF PERSONAL DATA? PERSONAL DATA SUBJECT TO PROCESSING, PURPOSE AND LAWFUL CONDITIONS OF THE PROCESSING

The life cycle of personal data describes the time when APCOA PARKING ITALIA SPA begins to process the personal data, the purposes and methods of the processing and the period of retention.

Which personal data do we process?	Why do we process them (purpose and legal basis)?	What would happen if we did not process the data?	For how long do we process them?
Personal details  Tax data  Contact data  Car registration number	The processing is necessary for the execution of the contractual relationship.	Granting personal data is necessary for the execution of the contractual relationship so any refusal to answer, at the time the information is collected, or any refusal to allow the data to be processed, would make it objectively impossible for APCOA PARKING ITALIA S.P.A. to fulfil the legal or contractual obligations laid down, and to properly manage the reciprocal contractual and/or commercial relations, and/or the necessary administrative and accounting fulfilments.	Your data will be processed for the entire duration of the contractual relationship and, in any event, up to the termination of the procedure as part of which they were acquired.  Cases in which the processing may have a longer duration than the contractual relationship:  - 10 years: the personal data necessary shall be retained for ten years as the proof and documentation required for taxation and accounting purposes or for other legal obligations;  - Until the conclusion of any judgements or alternative means of settling disputes or grievances in the event of conflict with the Client.
Images	Video surveillance systems operate in some facilities.  Processing is necessary for the pursuit of the legitimate interest of making secure its facilities and its corporate assets in order to ensure the safety of its clients inside the area, as well as confirming the due compliance with the matters governed by the parking Regulation.	Those concerned who enter the area under video surveillance	The images are automatically deleted 24 hours after their recording.  Cases in which the processing may have a longer duration than the contractual relationship:  - Should the police of the Criminal Investigation Department request access to the images.

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#### FOR WHAT OTHER PURPOSES MAY THE PERSONAL DATA BE PROCESSED?

- Your data may be processed for purposes connected to the management of the ordinary contractual and commercial relations and, specifically, for keeping supplier accounts, billing and creditor management in order to meet the obligations laid down by the current regulations.
- Your data may also be processed for any purposes connected to the management of the exercise of the credit right enjoyed by the undersigned Company and arising from the breach of the parking regulations, carrying out for this purpose all and only the strictly correlated activities. The duration of the processing is limited to what is strictly necessary to exercise the above rights and, in any event, for a maximum of five years from the exercising of the credit right enjoyed by the company APCOA PARKING ITALIA SPA, in compliance with the current tax regulations and, in particular, article 43 of the Presidential Decree 600/1973 and article 57 of the Presidential Decree 633/1972.
- Your data may, where necessary, also be processed by APCOA PARKING ITALIA SPA for exclusively internal statistical purposes, market research and for communications of a commercial nature, in its own name and/or in its own name and on behalf of others, in compliance with the current tax regulations and, in particular, article 43 of the Presidential Decree 600/1973 and article 57 of the Presidential Decree 633/1972 referred to above.

#### 2. WITH WHAT METHODS WILL THE DATA BE PROCESSED?

The processing of your data may be carried out by means of both computer and manual instruments, in compliance with all the technical and organisational measures made available by the Data Controller in order to ensure the security and confidentiality of the information.

#### 3. WHO PROCESSES THE PERSONAL DATA?

- Your data shall be processed by persons who are authorised and appropriately trained for the processing, who, in any event, shall be obliged to maintain professional secrecy and the utmost confidentiality.
- The personal data shall also be processed by external Data Managers, the updated list of whom can be consulted on the Company's internet site: <http://www.apcoa.it/privacy.html>

#### 4. WHO MAY INFORMED OF THE PERSONAL DATA?

- Your data may be communicated to third parties, solely for technical and operational requirements connected to the purposes outlined above and, in particular, to the following categories of subjects:
  - A. from/to public authorities and administrations for purposes connected to the fulfilment of legal obligations;
  - B. from/to public and private Social Security Entities to which the transfer of your data is necessary for the conduct of the activity of our company in relation to the discharge, on our part, of the contractual/commercial obligations in your regard;
  - C. from/to banks, financial institutes or other subjects to which the transfer of your data is necessary for the conduct of the activity of our company in relation to the discharge, on our part, of the contractual/commercial obligations in your regard;
  - D. from/to subjects to which the right of accessing the personal data is acknowledged by provisions of the law or secondary or European Union regulations, as well as specific contracts and agreements, duly signed;
  - E. from/to subjects to which the communication of personal data is necessary or, in any event, functional to the execution of the contractual obligations in being;
  - F. from/to public and private subjects on behalf of which APCOA PARKING ITALIA SPA conducts its activity, for the purposes and within the limits laid down in the respective contracts;
  - G. to the competent Municipal Police in order to enable the party concerned to make use of any concessions or for the necessary administrative fulfilments.
- The data may, where necessary, also be communicated:
  - to the Public Automobile Register (PRA) and the Automobile Club of Italy with registered office in Rome, Via Magenta no. 5, in order to meet all the technical and operational requirements strictly connected to the exercise of the contractual rights laid down by the parking Regulations/General Contractual Conditions that govern the parking of automobiles and/or motor vehicles in the car parks and/or parking meter areas managed and/or administered by us, in our own name and/or in the name and on behalf of third parties;
  - to Poste Italiane Spa, with registered office in Rome, Viale Europa 190, and to Postel S.p.A., with registered office in Rome, Via Carlo Spinola n. 11, in order to meet all the technical and operational requirements strictly connected to the exercise of the contractual rights laid down by the parking Regulations/General Contractual Conditions that govern the parking of automobiles and/or motor vehicles in the car parks and/or parking meter areas managed and/or administered by us, in our own name and/or in the name and on behalf of third parties.

#### 5. WHAT ARE MY PRIVACY RIGHTS AND TO WHOM MUST I APPLY?

- With regard to the aforementioned processing, the person concerned can exercise all the rights referred to in articles 12-22 of the European Regulation no. 679/2016.

The person concerned in the processing has the right to apply to the Data Controller for:

- Access to their personal data;
- Rectification or deletion of the personal data;
- Limitation of the processing that concerns them;
- Opposition to the processing of the personal data;
- With reference to the personal data processed by automated methods, the right to the portability of the data.

With reference to the processing of health and sensitive data based on consent, the person concerned has the right to revoke this consent at any time without prejudicing the legitimacy of the processing based on the consent given before the revocation.

The person concerned has the right to make a complaint to the Italian Data Protection Authority. For further information on the right to make a complaint, please visit the following web page: <https://goo.gl/GLbTN9>

Data Protection Officer (DPO): [ext.dpo@apcoa.it](mailto:ext.dpo@apcoa.it)

The Data Controller will make use of the Data Protection Officer to respond to applications regarding the exercise of the rights of interested parties.

APCOA PARKING ITALIA SPA



#### **DO YOU WANT TO RECEIVE FURTHER INFORMATION?**

By positioning a smartphone camera on the QR Code, it is possible to view, on the Company's internet site [www.apcoa.it](http://www.apcoa.it), the archive of previous versions of the privacy information briefing, the information briefing regarding the processing of recorded video images and the updated list of the Data Managers of APCOA PARKING ITALIA SPA, internal and external.