

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of Regulation (EU) 679/2016 ("GDPR") and the European and national regulation that supplements and amends it (together with the GDPR, the "**Applicable Privacy Law**"), this information is provided.

1. Identity and contact details of the Data Controller

The Data Controller is TPER S.p.A., with registered office in Bologna via di Saliceto 3 40128 Bologna

2. Contact details of the Data Protection Officer

A Data Protection Officer (DPO) has been identified and can be contacted at the following email address: privacy@tper.it

3. Purposes of the processing as well as the legal basis for the processing

(a) Required legal and contractual purposes - processing required to fulfil a contractual or legal obligation to which the data controller is subject or to carry out a specific request of the data subject

Personal data may be processed, without the need for consent, only where necessary to comply with legal obligations in statutory and tax matters, EU legislation, as well as rules, codes or procedures approved by Authorities and other competent institutions. Moreover, personal data may be processed to comply with requests by the competent administrative or judicial authority and, more generally, by public bodies in compliance with legal formalities.

Personal data will also be processed for purposes related to the provision of services by CORRENTE, such as specifically:

- for the fulfilment of obligations arising from the General Conditions, the Regulations and/or the provision of accessory services and/or services related to such contracts;
- for the provision of services requested by the customer with the registration on the website and/or App and the creation of his/her account and profile including the collection, storage and processing of data for the purposes of establishing and subsequent operational, technical and administrative management of the relationship (and account and profile created by the customer) related to the provision of services and the carrying out of communications relating to the performance of services;
- for the payment management (with related processing - within the terms of the law - of payment data, including the identification details of credit cards or prepaid cards) of the requested services and of any additional economic charges, based on the provisions of the General Conditions and/or other specific contractual conditions published on the website or otherwise made available to the customer;
- for the fulfilment of legal, accounting, tax, administrative and contractual obligations related to the provision of the requested services;
- for the management of relations with third-party public authorities and bodies for purposes related to the fulfilment of legal obligations or specific requests and procedures (e.g. serving of offence reports for the violations of the rules of the Highway Code);
- for the preparation of measures aimed at protecting against credit risk, including activities aimed at identifying the customer and his/her economic reliability/solvency, including during the course of the contractual relationship.

Such data - the provision of which is necessary for the operational, economic and administrative performance of the service - will also be processed by electronic means, recorded in special databases, and

used strictly and exclusively within the contractual relationship in place. Since the processing of data for the purposes referred to in the preceding points is carried out exclusively on the basis of a legal obligation or the fulfilment of obligations arising from the General Conditions and Regulations, the Controller will not require your consent for the same purposes. Failure to provide such data will make it impossible to provide the services in question.

b) Commercial and marketing purposes - consent

Personal data may also be processed, subject to specific consents, for the following additional purposes functional to the activities of the Controller or a third party:

- market research, economic and statistical analysis by the controller;
- market research, economic and statistical analysis by third parties;
- marketing of the services of the Controller, sending of advertising/informative/promotional material and participation in initiatives and offers aimed at rewarding the customers of the Controller;
- marketing of the services of a third party, sending of advertising/informative/promotional material and participation in initiatives and offers aimed at rewarding the customers of the Controller;
- surveys of the degree of customer satisfaction on the quality of the services provided by the Controller;
- surveys of the degree of customer satisfaction on the quality of the services provided by Third Parties;
- analysis of the use of car-sharing services in the most aggregated/anonymous form possible, to identify consumption patterns and propensities, to improve the services provided and to meet specific customer requirements;
- preparation of initiatives related to the contractual relationship and aimed at improving the provided services, such as, for example, carrying out surveys to obtain suggestions from customers.

These activities may concern products and services of the Controller, as well as of subsidiaries or business partners and may also be carried out through an automated call system, without the intervention of an operator, including email, and MMS (Multimedia Message Service), SMS (Short Message Service), push notifications (App and social networks).

The consent to the processing of data for the above purposes is optional and may be revoked directly by the customer by entering his/her personal area, or by using the appropriate unsubscribe function at the bottom of any electronic commercial and/or promotional communication received from the Controller.

c) Purposes of geographical location - consent

Personal data may also be processed, subject to consent also through the app or mobile device from which you make the reservation, for the purpose of geographical location of the user and/or device associated with the service of the Controller. Without such consent, it may be impossible for the Controller to enable you to use the services.

BUSINESS ACCOUNTS

When renting a vehicle as a “driver” of a “master” profile, i.e. using the payment account of a Company or as a member of a community, the data related to the rental will be shared with the owner of the profile which is paying the trip. Becoming a driver of a master profile, you authorise the owner of the master profile to access the above mentioned data. If you are invited to join a profile as a driver with an email address and you join with a different email address, the owner of the master profile will be able to see your email address.

d) Defending a right in court

Personal data will be processed whenever necessary in order to ascertain, exercise or defend the rights of the Controller or other subsidiaries and service partners in court or in a phase preparatory to judgement.

e) Legitimate interest of the Controller

The Controller may process personal data without consent in the following cases:

- preparation of a geolocation system for company cars/assets and any possible measure to protect them against any illegal or fraudulent acts carried out by the customer/user;
- preparation of a geolocation system for company cars/assets for the purposes of assessing and preventing accidents and emergencies. In this case, the legitimate interest of the controller also covers the activities of communication of such information, without identifying persons not involved in the accident, to insurance companies, for the assessment by the latter of any third-party liability insurance;
- in case of extraordinary operations of merger or transfer of a business unit, to allow the fulfilment of the pre-contractual obligations relating to the transfer and also functional to the establishment and/or continuation of contractual relations with any acquiring company or its subsidiaries. It is understood that only data necessary for the aforementioned purposes will be processed. To this end, the Controller will appoint any buyer as "data processor" for the due diligence phase preparatory to the transfer and to aggregate/anonymise personal data to the maximum extent possible. The Controller will retain the ownership of your personal data until the conclusion of the transfer process, at the end of which any buyer and/or its subsidiaries will become the new controllers and will see to any necessary legal requirements.

4. Recipients of personal data

In order to achieve the purposes indicated in point 3, the Controller may make the data available to various recipients, such as, for example, those belonging to the following subjects or categories of subjects:

- police forces, armed forces and other public administrations for the fulfilment of obligations envisaged by law, regulations or EU legislation. In such cases, based on applicable laws and regulations on data protection, the obligation to obtain the prior consent of the data subject to such communications is excluded;
- Parent, subsidiary or associated companies, entities or associations pursuant to Article 2359 of the Italian Civil Code, as well as among consortia, networks of companies and temporary business combines and with their members, limited to communications made for administrative and/or accounting purposes, previously authorised by the DPO and only within the EU;
- insurance companies competent for the settlement of claims;
- Companies specialised in debt collection;
- Companies specialised in the management of commercial or credit information, or advertising promotion, previously authorised by the DPO and only within the EU;
- other companies that carry out the activity of car sharing and/or accessory services with which the Controller has agreements of various types; provided that they are previously authorised by the DPO and only within the EU;
- other companies contractually related to the Controller that carry out accident management activities.

The Controller makes sure that the communication of personal data to the aforementioned recipients concerns only the data required for achieving the specific purposes for which it is intended.

Personal data is stored in the databases of the Controller and will be processed only by authorised personnel. The latter will be provided with specific instructions on the methods and purposes of processing. Moreover, such data will not be disclosed to third parties, except as provided above and, in any case, within the limits indicated therein.

Personal data will not be disclosed, except in the cases described above and/or required by law.

5. Transfer of personal data outside the EU

Data will not be transferred outside the EU.

6. Data retention period

The data will be retained for a period of time not exceeding the one required by the purposes for which it was collected or subsequently processed in accordance with the provisions of the law.

In case of accidents, the data - including the geographical location data of the car - will be retained for the next 24 months in accordance with the time limit laid down in article 2947, paragraph 2, of the Italian Civil Code for the purpose of asserting claims, if any, relating to the occurrence of damage caused by car traffic.

For assessing any offences not related to traffic and for asserting the right to compensation for the relevant damage, your data - including the geographical location data of the car - will be retained for five years from the date on which the offence occurred, pursuant to Article 2947, paragraph 1, of the Italian Civil Code.

Except in the cases of offence described above, the data necessary to defend oneself against possible claims made in connection with the contract itself will be retained for 10 years from the termination of the existing contractual relationship pursuant to Article 2946 of the Italian Civil Code, unless further retention of some or all of the data is required by law.

7. Data subject rights

As a data subject, the following rights are acknowledged to the personal data collected and processed by the Controller for the purposes indicated in point 3.

a) Right of access: You have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, obtain access to the personal data and the following information: (i) the purposes of the processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular if they are recipients in third countries or international organisations; (iv) where possible, the envisaged period of retention of the personal data or, if that is not possible, the criteria used to determine that period; (v) the right to lodge a complaint with a supervisory authority.

b) Right to rectification and erasure: You have the right to obtain the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, also by providing a supplementary statement. The data subject has also the right to obtain the erasure of personal data where one of the following grounds applies: (i) The personal data is no longer necessary for the purposes for which it was collected or otherwise processed; (ii) the data has been unlawfully processed; (iii) you have withdrawn the consent based on which the Controller had the right to process your data and there is no other legal ground for the Controller's processing; The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal; (iv) the data subject objected to the processing and there are no overriding legitimate grounds; (v) the personal data has to be erased for compliance with a legal obligation.

The right to disregard the exercise of these rights to erasure remains unaffected if the right to freedom of expression and information prevails or for the exercise of a legal obligation or to defend one's rights in court.

The following rights are also recognised:

- a) Right to data portability, i.e. to receive in a structured, commonly used and readable format personal data provided and processed on the basis of consent or other legal basis, as well as the right to send such data to another Data Controller without hindrance within the limits envisaged by Art. 20 of the GDPR.
- b) Right to restriction of processing where one of the following applies: (i) for a period enabling the Controller to verify the accuracy of the personal data; (ii) in case of unlawful processing of personal data; (iii) even if the personal data is not necessary for the purposes of the processing, in any case where there is a need for it to be processed for the establishment, exercise or defence of a right in court; (iv) for the period necessary to verify whether the legitimate grounds of the Controller prevail over the request to oppose the processing.

Any rectifications or erasures or limitations of the processing carried out on request - unless this proves impossible or involves a disproportionate effort - will be communicated by the Controller to each of the recipients to whom the personal data was sent. The Controller may communicate these recipients upon request.

You can exercise the rights listed above by writing to the Data Protection Officer at privacy@tper.it, detailing in particular the circumstance in question and the specific requests.

The right to apply to the competent data protection authority in the event of unlawful data processing is guaranteed.

8. Consent to the processing and requirement to notify data

For the processing of data for optional purposes of marketing, profiling and geographical location necessary for the reservation and use of the car, consent to the processing is required.

With the exception of the consent for the geographical location functional to the reservation and use of the car, if you do not accept the direct marketing and profiling processing, there will be no effect on the existing contractual relationship and on the provided services.

PROCESSING OF PERSONAL DATA (pursuant to Applicable Privacy Law)

Examined the above Information

I, the undersigned, after reading and taking note of the contents of the above information,

☐ agree ☐ do not agree

to the processing of my personal data necessary for the purposes of direct marketing (surveys, promotional communications, market research) carried out through automated (email, text messages, mms, push notifications) and non-automated (telephone with operator, paper mail) tools of the Controller; (*direct marketing of the Controller, optional*)

☐ agree ☐ do not agree

to the processing of my personal data necessary for the purposes of direct marketing (surveys, promotional communications, market research) carried out through automated (email, text messages, mms, push notifications) and non-automated (telephone with operator, paper mail) tools of third parties, in the context of initiatives and offers aimed at rewarding the customers of the Controller; (*direct marketing of third parties, optional*)

☐ agree ☐ do not agree

to the processing of my personal data necessary to profile my using habits of the service of the Controller and my driving habits, to receive commercial communications in line with them (*profiling, optional*)