

Toll Payment Management A24 e A25
Privacy Policy
pursuant to articles 13 and 14 of EU Regulation 2016/679 (GDPR)

Before acquiring your personal data for the management of toll payment, Anas S.p.A. invites you to carefully read the information regarding the protection of personal data.



I. Data Controller and DPO

In this section we indicate our points of contact

- Anas S.p.A., **Data Controller**, represented by the Chief Executive Officer and *pro-tempore* General Manager, contactable at the e-mail address titolaretrattamento@stradeanas.it, with registered office in via Monzambano 10 - 00185 Rome;
- **Data Protection Officer** can be contacted at the e-mail address protezionedati@stradeanas.it.



II. Types of personal data

In this section we indicate which types of data we process

The personal data subject to processing may belong to the following categories:

- **Common:** name, surname, date of birth, contact details (residential address, telephone number, e-mail address), tax identification code, identity document identifiers (licence/identity card/passport number), photo of vehicle license plate (in case of alleged irregularities and checks related to correct toll collection), transit data (entry and exit tollbooth of the motorway section), number of non-payment report.



III. Purposes of processing

In this section we indicate the purpose of the processing carried out on your data

Personal data are processed for the following **purposes**:

1. to verify the correctness of the mileage transits travelled, calculate the correct toll collection, and, in the event of non-payment, allow the payment of the amount due and process the receipt of payment (Legal Basis: *compliance with a legal obligation to which the controller is subject and execution of a contract to which the data subject is a party*)
2. to manage the regularisation of payments in the event of failure to give change or in the event the user has not the receipt of the entry tollbooth (Legal Basis: *compliance with a legal obligation to which the controller is subject and execution of a contract to which the data subject is a party*);

3. to manage outstanding debt collection activities (*Legal Basis: legitimate interest of the controller in recovering of outstanding debts*)
4. to verify the identity of the user of the payment card (e.g. Viacard) in the event the card is withdrawn (*Legal Basis: legitimate interest of the controller in preventing fraud*);
5. to provide feedback to the Police and the Judiciary regarding the commission of possible offences (*Legal Basis: compliance with a legal obligation to which the controller is subject*);
6. to handle any proceedings in and/or out of court (*Legal Basis: legitimate interest of the controller in the legal defence of its rights*).

Toll stations on the A24 and A25 motorways are equipped with a video recording system which, in the event of non-payment of the toll, of a user without an entry ticket or engaging the tollbooths improperly or with improperly functioning equipment, or in the event of a payment card being withdrawn, automatically records the license plates of transiting vehicles for the above-mentioned purposes.

The provision of personal data for these purposes must be considered compulsory and, therefore, failure to provide such data or partial/incorrect provision may result in the impossibility of correctly carrying out the relevant activities.



IV. Data recipients

In this section we indicate who processes your data and to whom they are communicated

For the pursuit of the aforementioned purposes, the personal data provided may be processed by the following subjects

- **Area referable to Anas S.p.A.:**
 - subjects working under and/or under subcontracting of Anas S.p.A. and who need it for the job performed or for the hierarchical position held. Such subjects are suitably trained in order to prevent data loss, data destruction, unauthorised access to the data or unauthorised processing of the data;
 - subjects acting as Data Processors on behalf of ANAS S.p.A. falling within the following categories:
 - o **Service companies** managing computer systems and related data processing procedures within toll management and debt collection.

- **Area not referable to Anas S.p.A.:**

Your personal data may also be transferred to other independent data controllers, on the basis of laws or regulations or on the basis of your specific consent, who process your data as indicated in their privacy notices, which we invite you to read:

- **Service company** managing online settlement activities for non-payment reports. The activities in question are carried out by NEXI Payments S.p.A. with registered office and general management at Corso Sempione 55, 20149 Milan, which acts as an independent data controller. The details of your credit card and/or means of payment used to settle the non-payment report and/or the details of the online transaction are not transmitted to Anas S.p.A., which only receives notification of payment of the disputed amount
- **services companies** managing electronic payments at toll stations and acting as independent data controllers, including Autostrade per l'Italia S.p.A., with registered office in Via A. Bergamini, 50, 00159 Rome, Telepass S.p.A., with registered office in Via Laurentina 449, 00142 Rome, and American Express Italia S.r.l., with registered office in Viale Alexandre Gustave Eiffel 15, 00148 Rome;
- **consultants and professionals** bound by professional secrecy, to whom the Data Controller outsources the management of legal proceedings;
- **banks** indicated for the payment of non delivered changes amounts;
- **Government authorities and judicial Authorities.**

The updated list of data recipients is available by requesting it at datamanagerstabruzzomolise@stradeanas.it.



V. Data retention

In this section we indicate how long we keep your data

Personal data processed for the purposes listed in points 1 to 4 are retained for as long as necessary for the purposes for which they are collected in compliance with the 10-year prescriptive period provided by law for the keeping of documents of a fiscal, tax and legal nature.

Personal data processed for the purposes referred to in points 5 and 7 are retained for 10 years from the settlement of the dispute or the conclusion of the judicial/ extrajudicial settlement.

The data may be processed for a longer period in presence of an act interrupting and/or suspending the statute of limitations which justifies the extension of data retention.



VI. Rights of data subjects

In this section we indicate which rights we guarantee you

EU Regulation 2016/679 (Articles 15 to 22) grants data subjects the exercise of specific rights. In relation to the processing of your personal data, you have the right to ask Anas S.p.A. for access, rectification, deletion, limitation, objection and portability. In addition, you can lodge a complaint with the Supervisory Authority, which in Italy is the Garante per la Protezione dei Dati Personali. At any time, you can request to exercise your rights to Anas SpA contactable at the e-mail address datamanagerstabruzzomolise@stradeanas.it or by contacting the Data Protection Officer contactable at the email address protezionedati@stradeanas.it.