



DATA COLLECTION AND PROCESSING FOR THE MANAGEMENT OF LOCAL PUBLIC TRANSPORT ADMINISTRATIVE FINES

DISCLOSURE REGARDING THE PROCESSING OF PERSONAL DATA made pursuant to arts. 13 and 14 of EU Regulation no. 2016/679

Dear Customer,

We would like to inform you that EU Regulation no. 2016/679 and Italian Legislative Decree no. 196 of 30/06/2003, also known as the "Personal Data Protection Code", provide for the protection of persons and other parties with regard to the processing of personal data. In particular Start Romagna S.p.A. is required to provide you with certain information regarding the use of your personal data.

The processing of the data will be based on the principles of lawfulness, fairness, and transparency and the protection of your confidentiality and rights.

DATA CONTROLLER

The "Data Controller" is Start Romagna S.p.A. with registered office at Viale C. A. Dalla Chiesa 38, Rimini.

DPO - Data Protection Officer

Start Romagna S.p.A. has appointed a Data Protection Officer (DPO) who can be contacted at the following e-mail address: dpo@startromagna.it

TYPE OF DATA

START ROMAGNA S.P.A. collects and processes exclusively personal data identifying a person who has been fined (first name, surname, address, etc.) and possibly data belonging to particular categories pursuant to art. 9 of the European Regulation (e.g. data concerning health). These data are provided directly by the fined person. Pursuant to the provisions of Article 47 of Italian Presidential Decree no. 445 of 28/12/2000, the customer is aware of the penalties imposed for

false statements, as provided for by the Italian Criminal Code and special applicable laws.

PURPOSES AND METHODS OF PROCESSING

PURPOSES OF PROCESSING: The data referred to in this disclosure are collected and processed for the purpose of managing administrative fines in connection with Local Public Transport Services, in fulfilment of legal obligations or regulations in force. The data collected may be used for statistical analyses carried out in aggregate and anonymously (i.e. without the use of identifying data).

PROCESSING METHODS: processing is carried out not only on paper but also with electronic and automated means. The data requested will be adequate for the purposes set out above, processed in a manner that is relevant to those purposes, and limited to those purposes. Specific security measures are taken to prevent data loss, unlawful or incorrect use, and unauthorised access.

DATA ACCESSIBILITY

Within the Data Controller's organisation, your data can be accessed by the employees of the Ticket Administrative Fines Office, the Sales Office, the Ticket Control Service, the Administrative Area, and Information Services. They are authorised to process the data and have been adequately trained.

The data are made accessible to external entities with which Start Romagna S.p.A. collaborates and which Start Romagna S.p.A. has appointed as "Data Processor" or with which it shares the role of Data Controller for the data processing necessary for providing the requested transport service, such as:

- Public Transport Operators that perform ticket control services on behalf of START ROMAGNA;
- Third parties in charge of managing the notification of administrative fines and compulsory collection;
- Third parties in charge of maintenance and processing operations on START ROMAGNA S.P.A. databases;
- Certification body.

Furthermore, in accordance with the provisions of Italian Presidential Decree no. 15 of 15/01/2018, in the event of a request by the Law Enforcement Agencies for criminal investigation department activities, your data may be disclosed to these agencies, which will process them as independent Data Controllers for said purpose.

RECIPIENTS OR CATEGORIES OF RECIPIENTS

In addition to communications made in fulfilment of legal and contractual obligations, all data collected and processed may be disclosed exclusively for the purposes specified above to the following third parties:

- Local authorities for registry certifications;
- Banks and debt collection agencies for the management of cash receipts and payments;
- Tax authorities and other companies or public bodies in fulfilment of regulatory obligations;
- Companies and law firms for the protection of contractual rights;
- Tax collection agencies.

Personal data are not subject to disclosure.

RETENTION

All the aforesaid data shall be retained for the purposes set forth in this disclosure and for the amount of time strictly necessary to pursue the purposes for which they were collected or, in cases where this is provided for, within the mandatory time limits established by law.

In any case, the data shall not be retained for more than 10 years from the date of collection of the fine or archiving of the relevant file.

FREEDOM TO PROVIDE DATA AND GIVE CONSENT, CONSEQUENCES OF A REFUSAL

It is mandatory to provide the data for the purposes related to the fulfilment of legal obligations and the performance of activities that are strictly necessary for the purposes listed above.

There is no automated decision-making process within the scope of this processing, including profiling as set out in article 22, paragraphs 1 and 4 of EU Regulation 2016/679.

RIGHTS OF THE DATA SUBJECT

You may contact the Data Controller in order to exercise your rights as provided for in Articles 15 to 22 of EU Regulation 2016/679 and which are set out below:

- the right to ask the data controller for access to your personal data (Art. 15);
- the right to ask the data controller to rectify your personal data (Art. 16);
- the right to ask the data controller for the erasure of your personal data (Art. 17);
- the right to ask the data controller to restrict the processing of your personal data (Art. 18);
- the right to data portability (Art. 20);

- the right to object to the processing of your personal data (Art. 21);
- the right in relation to automated decision-making processes (Art. 22).

You also have the right to lodge a complaint with a supervisory authority.

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Rimini, 19 April 2021