

## INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATING TO USERS OF THE VEHICLE

### SUBJECTS INVOLVED IN THE PROCESSING

The **Data Controller** of your personal data is **KILOUTOU ITALIA SPA** (hereinafter, "**KILOUTOU**"), with registered office in San Biagio di Callalta (TV), Via Postumia Ovest 101, which can be contacted at the following email address: **privacy@kiloutou.it**. The Data Controller has appointed a Data Protection Officer (DPO), who can be contacted by the data subject at the following email address: **kiloutoudpo@unisef.it**.

### PURPOSES OF PROCESSING AND LEGAL BASIS

Personal data are processed for the following purposes:

1. to comply with contractual and legal obligations related to the business relationship (hereinafter referred to as the 'administrative and accounting purposes');
2. to use the email address provided to send commercial communications providing information on products or services similar to those covered by this contract (hereinafter the 'Marketing Purposes');
3. to protect the company's assets through the installation of GPS satellite tracking systems on rented vehicles (hereinafter the 'Asset Protection Purposes')

The legal basis for the purposes of processing is set out below.

|                                               |                                                                    |
|-----------------------------------------------|--------------------------------------------------------------------|
| <b>Administrative and accounting purposes</b> | Compliance with contractual and legal obligations                  |
| <b>Marketing Purposes</b>                     | Legitimate interest (Art. 130(4), Legislative Decree No. 196/2003) |
| <b>Asset protection purposes</b>              | Legitimate interest                                                |

### DATA RETENTION PERIOD

Your personal data will be retained for as long as necessary to comply with legal obligations. Where no statutory retention requirements apply, the Data Controller will retain the data for a period of time that is proportionate to the purposes described above.

In particular, the data will be retained in accordance with the timeframes set out below:

|                                               |                                                                                                                                                                                                                                                                          |
|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Administrative and accounting purposes</b> | For the period required by law and in accordance with the limitation period applicable to rights arising from the relationship, without prejudice to any further retention necessary for the final resolution of any disputes that may arise, even if already concluded. |
| <b>Marketing Purposes</b>                     | Until the termination of the commercial communication service or until the unsubscribe request is received.                                                                                                                                                              |
| <b>Asset protection purposes</b>              | For a period of up to 365 days from the date of collection                                                                                                                                                                                                               |

### NATURE OF DATA DISCLOSURE AND CONSEQUENCES OF FAILURE TO PROVIDE DATA

The provision of data for Administrative and Accounting Purposes and Asset Protection Purposes is necessary and constitutes an essential condition. Therefore, failure to provide such data will make it impossible to conclude the agreement. The provision of data for Marketing Purposes is optional; however, any refusal to provide such data will prevent the Data Controller from using your contact details for the sending of advertising communications

### CATEGORIES OF RECIPIENTS

Exclusively for the purposes specified above, all collected and processed data may be disclosed to internal personnel authorised to process data on the basis of their respective duties and access profiles, as well as group companies, banks and financial institutions, credit insurance and debt recovery companies, commercial information companies,





public and private bodies, including following inspections and audits, Companies providing IT services (e.g. data processing system support and hosting);

The entities among those listed above that process personal data on behalf of KILOUTOU are appointed as Data Processors.

#### **TRANSFER OF DATA TO A THIRD COUNTRY OR AN INTERNATIONAL ORGANISATION**

Personal data will not be subject to transfer to non-EU third countries or to international organisations

#### **DATA SUBJECT RIGHTS**

You have the right (pursuant to Articles 15–22 of the GDPR) to request that KILOUTOU provide access to your personal data and rectify any inaccurate data, as well as to erase such data or restrict its processing where the relevant conditions are met. You also have the right to obtain the portability of the data you have provided, only where such data is processed by automated means on the basis of your consent or a contract.

You also have the right to withdraw the consent given for processing purposes that require it, without affecting the lawfulness of the processing carried out up to the time of withdrawal.

You also have the right to lodge a complaint with the competent supervisory authority, the Italian Data Protection Authority.

You may exercise the rights indicated above by contacting the Company's Privacy Contact Person by email at: **privacy@kiloutou.it**

