

NOTICE PURSUANT TO ART. 13 AND 14 OF REG. (EU) 2016/679 ON THE PERSONAL DATA OF CUSTOMERS OF LOCAL PUBLIC TRANSPORT SERVICES

This notice is provided to you - pursuant to Articles 13 and 14 of European Regulation 2016/679 on the protection of personal data ("Regulation" or "GDPR") - and is intended for customers who use local public transport services provided by the Data Controller. This Notice is intended to inform users about the methods used to process their personal data. All data is processed lawfully, fairly, and transparently with respect to the data subject, in compliance with the general principles set forth in EU Regulation No. 2016/679 and applicable data protection legislation.

1. Data Controller

The Data Controller is AUTOGUIDOVIE S.p.A., tax code no. 00103400339, REA Milan no. 103484, VAT number no. 11907120155, can be contacted at tel. +39025803971, email autoguidovie@pec.it. The Data Controller has designated a Data Protection Officer (DPO) who can be contacted at the telephone number +39025803971 or at the e-mail address privacy@autoguidovie.it.

2. Description and purpose of the processing, nature of the personal data processed

The Data Controller processes certain personal data for the purposes set out in this notice. Specifically, this may include identification data (name, surname, date and place of birth and residence, tax code) and contact information (email address, telephone number); data relating to financial transactions (amount and date of transactions, last four digits of the credit card and expiration date); browsing and purchasing preferences; connection data (IP address of the device used); and geolocation data of the device used, if the app is activated. Furthermore, the Data Controller may become aware of special categories of personal data relating to eligibility for benefits, such as: health data relating to disability, data relating to family situations and/or income. The processing of personal data for these special categories is carried out in compliance with Article 9 of the GDPR.

The processing of such personal data has the following purposes:

1. To enable the collection of service purchase requests from the Customer through the available purchasing channels, the conclusion of the contract, and the performance of the services covered by the contract itself; without this data, it may not be possible to establish or correctly execute the contracts in question.
2. To verify the possession and validity of travel tickets by service customers, as required by current regulations regarding local public transport. In this context, the Data Controller processes the identification and contact details of customers who appear to have irregularities regarding their travel tickets, for the purpose of reporting the relevant violations and applying the relevant administrative sanctions. This data must be provided by the interested party to allow the Data Controller to implement the aforementioned regulations, and failure to provide such data may result in the intervention of the competent authorities. The purpose of this processing is to prevent and combat potential crimes and fare evasion.
3. Electronically transmit to Agenzia delle Entrate data relating to expenses and reimbursements incurred by individuals for the purchase of local public transport passes, accompanied by the relevant documentation, for the purpose of preparing the pre-filled tax return as required by current regulations regarding tax simplification and the pre-filled tax return. The interested party may object to this processing at the time of incurring the expense by selecting the appropriate checkbox during the purchase process or by communicating their objection in writing to the Data Controller at the contact details provided in this notice by December 31 of the year in which the expense was incurred, or according to the methods and terms published by Agenzia delle Entrate on its website.
4. With reference to IVOL and IVOP travel passes, transmit personal data, including contact details, to Regione Lombardia or entities appointed/participated by the same (for example, Polis Lombardia), as independent data controllers, for the purpose of enabling investigations pursuant to Article 20 of Regional Regulation No. 4 of 10 June 2014, necessary for the distribution of revenue relating to IVOL and IVOP travel passes.
5. In the event of receiving reports of theft, lost items, suggestions for service improvements, complaints, or requests for compensation, reimbursement, or reimbursement in relation to the local public transport service, any personal data communicated by the interested party will be processed only if permitted by applicable regulations and solely for the purposes of managing the aforementioned requests.
6. Conduct direct marketing activities aimed at its customers, who are guaranteed the right to object to such processing at any time and free of charge; in the event of objection, the customer's personal data will no longer be processed for these purposes.
7. Use video surveillance systems installed on board the vehicles used by the Data Controller and to provide local public transport services, which record the interior and immediate vicinity of the vehicle itself, and in certain areas accessible to the public, as well as wearable audio and video recording systems ("Body Cams") used on board the vehicle and at stops, for the purpose of ensuring the safety of users and crew and protecting the Data

Controller's assets. A specific pictogram (brief notice) is displayed on the vehicles and near the cameras, informing customers of the use of video surveillance. The complete notice is available on the website www.autoguidovie.it.

8. Use AVM (Automatic Vehicle Monitoring) technology systems installed on board vehicles, which allow for monitoring information relating to the moving vehicle, such as position, route, speed, and acceleration. This is done to provide users with information on waiting and travel times and to monitor the company fleet for service planning and route optimization, fuel consumption monitoring, and driving style analysis. A specific pictogram (brief information) is displayed on vehicles to inform customers of the use of these systems. The complete information is available on the website www.autoguidovie.it.
9. With the data subject's prior consent, when using the Autoguidovie or Miobus App, the location of the mobile device and, therefore, the data subject's geographic location (geolocation) may be known when using the App. This allows the Data Controller to provide the requested services, displaying the services available in the area in which the data subject is located and the affiliated businesses that provide the requested service based on the data subject's location; Geolocation can always be disabled, even temporarily, through the device settings used.
10. With the data subject's prior consent:
 - a. carry out information or commercial promotion activities by the Data Controller or Autoguidovie Group companies and to conduct customer satisfaction surveys;
 - b. communicate personal identification and contact data to third parties for promotional and commercial purposes.

3. Legal basis of the processing

- for the purpose of the preceding points from 1) to 5) from the need to satisfy the customer's request for services, the fulfillment of the relevant contractual and pre-contractual obligations, the response to requests or reports connected to the service provided, other than the fulfillment of obligations by applicable national and community regulations;
- for the purpose of the preceding point 6), from the legitimate interest of the Data Controller in the carrying out of direct marketing initiatives towards its customers, taking into account the relationship established with them and the protection of the rights and fundamental freedoms of the same, guaranteed to the contrary mentioned above;
- for the purpose of the preceding points 7) and 8), from the legitimate interest of the Data Controller to ensure the safety of users and traveling staff, as well as to protect the property of the Data Controller; ensure the functionality and proper execution of public transport activities.
- for the purpose referred to in points 9) and 10), the consent of the interested person.

4. Mode and place of data processing

Data processing takes place using both automated methods, on electronic media, and non-automated methods, on paper, in compliance with applicable regulations, using organizational methods and logic strictly related to the purposes indicated, in accordance with the provisions of Article 6 of the GDPR. Specifically, automated processing allows for multiple processing, aggregation, or extraction of information, including processing performed with artificial intelligence tools. Pursuant to Law No. 132/2025, processing using such AI tools occurs solely for the purposes for which the data was collected and in compliance with applicable regulations.

The Data Controller has implemented technical and organizational measures to provide an adequate level of security and confidentiality of personal data, in compliance with the provisions of Art. 32 of the GDPR. These measures take into account the state of the art of the technology, the costs of its implementation, the nature of the data and the risks associated with their processing. The purpose is to protect data from accidental or unlawful destruction or alteration, accidental loss, disclosure or unauthorized access and other forms of unlawful processing.

The data are processed by employees of the business functions deputed to pursue the above-mentioned purposes, expressly authorized to process and to whom appropriate operational instructions have been provided and by third parties duly identified as Responsible for processing pursuant to art. 28 of the GDPR.

5. Compulsory or optional nature of handing over the data and consequences of any refusal

Except for processing that provides for the consent of the data subject, the provision of data is mandatory as required by legal and contractual obligations and therefore the possible refusal to provide them in whole or in part may give rise to the impossibility of providing the requested services.

6. Data communication

The data collected and processed may be communicated, exclusively for the purposes specified above, to subjects belonging to the following categories:

- Entities signing the local public transport service contract, integrated vectors of transport services, and related superior bodies and subjects appointed by them for institutional purposes, in the cases provided for by law or regulation;
- entities providing services of verification of travel titles and boarding management, ticketing services, management of technological devices on board vehicles, surveillance, customer satisfaction, management of IT systems, communication and other technical services;
- entities that provide assistance and advisory activities to the Processing Holder in accounting, administrative, legal, tax and financial matters;
- subjects whose right to access data is recognized by provision of law or by order of the authorities.

Such subjects are also appointed by the Data Controller, where appropriate, Data Processor. The updated list of Data Processors can always be requested to the Data Controller.

7. Data retention time

Personal data processed for legal and contractual obligations are stored for 10 years, except for any retention periods provided for by law or regulation. Obliteration data can be stored for a time not exceeding 72 hours and are then anonymised. Personal data processed for the purposes of telematic transmission to the Revenue Agency are retained until 31 December of the sixth year following each tax year.

Personal data processed for direct marketing purposes are kept for 2 years from the last business interaction with the Customer.

The images recorded by the video surveillance systems are retained for a period not exceeding 7 (seven) days, the data collected by the AVM systems on board the vehicles are retained for a period of 10 years, as specified in the dedicated information.

Personal data processed with the consent of the data subject for the purposes of information or commercial promotion and geolocation are stored until the revocation of the consent itself.

It is made to save the possibility of defense of the rights of the Data Controller in all locations.

8. Transfer of data outside the EU.

The data subject's personal data may be transferred to countries outside the European Union (EU) or the European Economic Area (EEA). If these countries are not deemed adequate by the European Commission, the "transfer tools" referred to in Article 46 of the Regulation (such as standard contractual clauses) will be used, assessing the possible inclusion of additional measures to ensure a level of protection substantially equivalent to that required by EU law.

9. Rights of the data subject

As a Data Subject, i.e., the natural person to whom the personal data refers, you have the right to request from the Data Controller access to your personal data, rectification or erasure of your data, and to request restriction of processing or objection to such processing. You also have the right to data portability. To exercise these rights, please contact the contact details provided in this policy.

All requests received will be processed in accordance with applicable laws, including with regard to whether the conditions for their acceptance are met. In the absence of such conditions, the Data Controller may not process or reject the requests. The Data Controller makes every effort to respond to legitimate and well-founded requests within one month of receipt. Depending on the complexity and number of requests, as well as the information indicated above, this period may be extended by two months. Upon final processing of the request, the interested party has the right to lodge a complaint with the supervisory authority and seek judicial redress.

Updated: January 7, 2026. The updated version of this policy is available on the website www.autoguidovie.it. The Data Controller reserves the right to update its content, including in response to changes in applicable legislation. The changes will apply as soon as they are published on the website.