

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA –

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Pursuant to art. 13 of Regulation 2016/679/EU – general Regulation *on the protection data* (hereinafter also referred to as the "**Regulation**"), we inform the User that UnipolTech S.p.A. (hereinafter also referred to as "UnipolTech"), as Data Controller, will process some personal data referring to the User, for the purposes indicated below.

1. Who will process personal data?

UnipolTech S.p.A (www.unipoltech.com), registered office in Via Stalingrado 37 – 40128 Bologna, is the Data Controller of personal data referring to the User.

2. Which personal data will be processed?

Below UnipolTech provides the User with the categories of personal data that will be processed (hereinafter, the "**Data**"):

- a) personal data (name, surname, tax code, date of birth, address of residence/domicile), contact details (telephone number and e-mail address), copy of identity card and/or driving licence;
- b) data related to payment methods and instruments;
- c) location data. The location data could refer, alternatively: i. User's geographical location at the time of the request, to select the closest means of transport closest, ii. the position of the means of transport both before and during use, iii. at the exact point of departure and arrival using the chosen means of transport, iv. to any place the User has saved as favorite location.

3. Which is the purpose of Data treatment

Data will be processed for the purposes and on legal bases legitimizing the processing of such data indicated below:

- **(F1) – Personal Area Registration** (also referred as, "**Personal Area**"): the processing consists of the operations necessary for the creation and activation of the Personal Area within the application (also referred as, "**APP**") and the UnipolTech website, in order to use the services offered.
- **(F2) – Provision of Services made available to the User** (as detailed in the "*Terms and Conditions*" document; hereinafter also referred as "**Services**"): the processing concerns the provision of the Services made available to the User and/ or the processing of the order placed by the User. Particularly, the Data required from time to time may be processed on the basis of the Services requested by the User to UnipolTech from time to time.
- **(F3) – Administrative-accounting purposes and compliance with regulatory obligations**: the processing aims at pursuing administrative-accounting purposes as well as fulfilling regulatory obligations, applicable from time to time and connected to the provision of the Services.
- **(F4) – Request for information, contact and/or assistance and support**: the data processing occurs in order to respond to User's requests of information and clarifications, or to provide to the User with

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operational and/or technical assistance for the management of the procedures relating to the Services, as well as any other support, even during an ongoing relationship.

- (F5) – *Protection rights*: the data processing occurs in order to ensure the Data Controller’s (in ita – Titolare) protection rights, also in a defensive way, both in and out of court.

Personal data will be processed for the purposes and on legal bases legitimizing the processing of such data indicated below:

#	Data categories	Legal base	Data Provision
F1	a); b); c).	Need to perform a contract to which the User is party.	Necessary for the aforementioned purpose; if not provided, it will not be possible to proceed with the registration to the Personal Area.
F2	a); b); c).		Necessary for the aforementioned purpose; if not provided, it will not be possible to proceed with the provision of requested Services and/or fulfill the order requested.
F3	a); b); c).	Need to comply with the regulatory obligations applicable from time to time.	Necessary for the aforementioned purpose; if not provided, it will not be compliant with regulatory obligations applicable from time to time and UnipolTech may not be able to provide the User with the requested Services.
F4	a); b); c).	Need to perform a contract in which the User represents a party, that is to execute a request in pre-contractual phase.	Necessary for the aforementioned purpose; if not provided, it will not be possible to provide the User with the requested assistance and/or support.
F5	a); b); c).	Legitimate interest of UnipolTech represented by the need to protect its rights.	Necessary for the purpose aforementioned; if not provided, it will not be possible to proceed with the provision of requested Services.

4. What is the Data Treatment?

The processing of Personal Data is always subject to the adoption of logics and methods, also IT, strictly related to the aforementioned purposes, subject to the adoption of the security measures deemed appropriate to the risks and will be made accessible only to authorized and trained personnel, to the sole extent of what is strictly necessary for carrying out the activities to which the personnel is responsible.

5. To whom the data will be communicated?

The above-mentioned Data will not be subject to dissemination and may be communicated to third parties, for the only aforementioned purposes. Particularly, Data can be communicated to:

- external parties to whom UnipolTech outsources activities on its own behalf (by way of example but not limited to, IT and telematic service providers, debt collection companies, etc.), and with whom UnipolTech defines special agreements governing the processing of data.
- other companies of the Unipol Group¹, if necessary for the pursuit of the aforementioned purposes
- external subjects, independent data controllers and UnipolTech's data processors, to whom communication is essential for the provision of the requested Services (e.g., Public Administrations, affiliated structures and entities, third-party companies supplying the Services offered);
- to the competent judicial authorities, Public Administration, supervisory or public security authorities, both for the purpose of following up on the need to protect a right of UnipolTech, and if this proves necessary in order to comply with a law provision, regulation or European legislation, that is on the basis of an order and/or provision of the aforementioned competent authorities;
- to subjects authorized to access some Data necessary for the performance of auxiliary activities to the contractual relationship in question (such as, by way of example, and not exhaustively, banks and credit institutions, post office or other companies providing similar services, surveillance, or companies that provide roadside assistance services).

The Data will not be transferred to countries located outside the European Union or the European Economic Area; should this be necessary for the pursuit of the aforementioned purposes, UnipolTech will do so on the basis of the guarantee measures provided for by the Regulation, such as for example an adequacy decision by the European Commission, or the signing of standard contractual clauses with the data importer.

6. Which are the data retention periods?

The Data will be processed for the duration of the existing contractual relationship and subsequently stored, for administrative-accounting purposes, as well as for the fulfillment of the regulatory obligations applicable from time to time, for **ten (10) years** from the last registration.

In detail:

¹ For further information, please refer to the list of Group's companies available on Unipol Gruppo S.p.A. website www.unipol.it.

Finalità	Data retention periods
F1	Data will be processed by UnipolTech until the deactivation of the User's Personal Area, which can occur upon User's request or after two (2) years from User's last access.
F2	For the duration of the contractual relationship and until its termination.
F3	For ten (10) years from the last accounting registration.
F4	For the time strictly necessary to process the request and subsequently in compliance with the terms established for the contractual relationship, if applicable.
F5	For the limitation periods established by the sector legislation, as well as for the duration of any dispute and/or for the additional terms deemed useful for the purpose in question.

Once the aforementioned terms have elapsed, the Data will be deleted or made anonymous.

7. User's rights

The Privacy Law (Articles 15-22 of the Regulation) guarantees the User, as the Data Subject, the right to access the data concerning him/her, as well as to have them rectified and/or supplemented, if incorrect or incomplete, erased or transferred, if processed unlawfully, and the portability of the data that the User has provided UnipolTech, if processed in an automated way for the contractual services requested by the User, within the limits of the provisions of the Regulation (article 20).

The privacy legislation also gives the User the right to request the limitation of data processing, if the conditions are met and to oppose the processing for reasons related to User's particular situation.

The Data Protection Officer is available for any doubts or clarifications, for the exercise of Data Subjects' rights: the User can contact him at the email address privacy@unipoltech.it.

This is without prejudice to the User's right to appeal to the Data Protection Authority, also by means of a complaint, where deemed necessary for the protection of the User's Personal Data and rights in this matter.