



PRIVACY POLICY

INTRODUCTION

In accordance with Articles 13 and 14 of Regulation (EU) No. 679/2016, and in general compliance with the transparency principle provided by the GDPR itself, Mr. Pier Luigi Marchesini provides the following information regarding the processing of personal data of customers and potential customers ("Data Subject or Customer").

1. DATA CONTROLLER

The Data Controller is Mr. Pier Luigi Marchesini, born in Verona on 19/06/1966, owner of the sole proprietorship named "ELETTRAUTO DUETTI di Marchesini Pier Luigi", located in SAN GIOVANNI LUPATOTO (VR), at via Damiano Chiesa n. 50, VAT number 04014270237 and Tax Code MRC PLG 66H19 L781F

Contact email address: rentduetti@gmail.com to which you are kindly requested to send any inquiries.

2. PURPOSES OF PROCESSING

The processing of personal data may have the following purposes:

- A) conclusion of vehicle rental contracts and/or other services including assistance services offered by the Data Controller, including the fulfilment of pre-contractual measures and information requested by the Data Subject and contractual obligations (on behalf of and in favour of the Data Controller), and therefore for purposes strictly related to managing customer relationships, including administrative, tax, and accounting formalities and obligations, as well as for any further activities instrumental to the conclusion and execution of a contract, such as, for example: acquisition of preliminary information for the conclusion of a contract, for operational and managerial needs; for payment control purposes and subsequent actions; to access, and possibly use, all services including interactive services of the Website, etc.; internal statistical analysis, management of incidents and injuries, and management of pre-litigation and/or litigation (contractual breaches, warnings, transactions, debt recovery, including checks on the solvency of the Data Subject, arbitrations, judicial disputes, etc.);
- B) compliance with regulatory obligations (both national and community) and provisions issued by authorities authorized by law and supervisory and control bodies;
- C) (if the Data Subject does not express dissent) transmission, through the email coordinates provided by the Data Subject, of communications concerning commercial offers for the direct sale of products or services similar to those already provided, including promotion to its "followers" subscribed to the company pages provided that the Data Subject, adequately informed, does not refuse such use, initially or on subsequent occasions (marketing purposes on similar products, so-called soft spam);
- D) (in case of Data Subject's consent) promotion and sale of products and services (also from partner companies, but without communicating data to them) carried out through telephone, advertising material, automated communication systems, email newsletters, etc. market research and customer satisfaction surveys also carried out through the work of specialized companies through personal or telephone interviews, questionnaires, online surveys aimed at specific proposals of products and services (marketing purposes);
- E) (in case of Data Subject's consent) communication to third parties of data for marketing purposes and/or customer satisfaction surveys.

3. TYPES OF DATA PROCESSED AND DATA SOURCE

The data processed for the execution of the contract or pre-contractual measures requested by the Customer may include personal data ("Personal Data") communicated by the Data Subject or acquired during the contractual relationship, as well as other data and information relevant to the services in question. By way of example, the following categories of data may be processed:

- *identifying data*: data allowing direct identification, such as name, personal data, identity card/passport and domicile data, driving license and documents of the Customer's legal representative and/or prosecutor and/or contact person and/or employee as well as identifying data of other drivers; tax code and/or VAT number, as well as, if applicable, fiscal domicile, SdI destination code;
- *contact details*: communication-related data (via internet, telephone, etc.), such as landline or mobile phone numbers and/or email and pec (certificated mail) addresses and/or other contact data;
- *economic and financial data*: billing data, as well as invoice delivery address, and payment methods, including data necessary for payments, such as bank details (e.g., IBAN) or data relating to the credit card proving the execution of payments (identifying details of payments) and, if applicable, any other data relating to the solvency and punctuality in payments of the Customer;
- *personal data including sensitive data*: health data (for example, in case of support request for a disability of the Customer or the driver, or to provide manual controls or to verify an accident in order to collaborate with insurance companies or manage compensation requests for any injuries suffered);
- *data relating to health status*, the processing of which is required by regulatory provisions or provisions of public authorities during the state of emergency (for example, for the management of pandemics or other health emergencies). Where the Data Subject is familiar/ legal representative and/or prosecutor and/or employee and/or contact person of the Customer, the source of the data will be the Customer himself and the processing of the relevant Personal Data will be carried out within the limits of the purposes mentioned above.

4. LEGAL BASIS OF PROCESSING AND OBLIGATION TO PROVIDE DATA

With regard to the aforementioned purpose A), "conclusion of contracts and fulfilment of contractual obligations", there is no obligation to provide data in the pre-contractual phase, but failure to provide it will result in the impossibility of fulfilling the request for supply and/or service. Once the contract is concluded, the provision of further necessary data, or the updating of those already provided, is mandatory for everything required by legal and contractual obligations, and therefore, any refusal to provide them in whole or in part may result in the Company's inability to execute the contract and may constitute contractual non-compliance or violation of the law by the Customer.

Regarding the aforementioned purpose B), "fulfilment of regulatory obligations or provisions of authorities", the Data Subject will be asked, if not already available as collected for the aforementioned purpose A), for the data relevant to the fulfilment of such obligations by the Data Controller, and failure to provide it could constitute a violation of the law by the Data Subject.

The legitimacy of the processing of data for the aforementioned purposes therefore derives from the fact that it is necessary for the execution of the contract of which the Data Subject is a part (or, in the pre-contractual phase, in relation to pre-contractual measures within the contractual process), or to comply with legal obligations related to the contract itself or in any case to the provision of the product and/or service.

Therefore, the legal basis for the processing of the aforementioned purposes A) and B) consists in the fact that the processing is necessary: for the performance of a contract or, in the pre-contractual phase, for the execution of pre-contractual measures adopted at the request of the Data Subject; for compliance with a legal obligation to which the Data Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller. The processing of data for the aforementioned purpose C) "marketing on similar products, so-called 'soft spam'", may take place unless the Data Subject, adequately informed, does not refuse such use, initially or on subsequent occasions, as provided by paragraph 4 of art. 130 Legislative Decree no. 196/2003 and subsequent amendments. The data provided for processing of the aforementioned purpose C) "marketing on similar products, so-called 'soft spam'", may be processed within the Data Controller's legitimate interest in offering the Customer a personalized service and/or product.

As for the purposes related to the activities described in letters D) "marketing" and E) "communication to third parties for marketing purposes", the processing will only take place with the express consent of the Data Subject, therefore, also in relation to data already communicated for purposes A) and B), in the absence of the Data Subject's consent for the specific additional purpose, the processing will not be carried out, with the consequence that in case of failure to provide the data possibly further necessary for the specific purpose and in any case in case of failure to give express consent to the respective individual processing, the activities described in the aforementioned letters D) and E) of the purposes will not be carried out.

5. DATA COLLECTION, PROCESSING METHODS, AND DURATION OF PROCESSING

The data is collected from the Data Subject, namely the data provided by the Customer for the execution of pre-contractual measures and to fulfil the contract and the obligations related to it. The processing will be carried out:

- through the use of manual and automated systems;
- by subjects or categories of authorized persons assigned to perform their respective tasks;
- with the use of measures suitable to ensure the confidentiality of the data and prevent unauthorized access by third parties.

With reference to purposes from C) to E) of the previous point 2., it is highlighted in particular that personal data will also be processed through:

- a) the use of automated calling systems or call communication;
- b) electronic communications made via email, fax, Mms (Multimedia Messaging Service) or Sms (Short Message Service) messages or other types;
- c) the use of operator-assisted telephone and postal mail.

The Personal Data subject to processing for the purposes mentioned in the previous point 2. will be kept in compliance with the principles of proportionality and necessity, and in any case until the purposes of the processing with their respective legal basis of processing have been pursued.

In the event that a contract is concluded with the Data Controller, regarding purposes A) and B) of the previous point 2., the Data Subject's Personal Data will be kept for the entire duration of the contractual relationship, and after the termination of the relationship - limited to the data necessary at that time - for the fulfilment of contractually assumed obligations and for the completion of all legal obligations and contractual protection needs connected or resulting from it.

For purpose C) "soft spam" of the previous point 2., the processing will in any case cease - if the Data Subject does not revoke consent ("unsubscribe") earlier - at the end of the contractual relationship.

For purposes D) "marketing" and E) "communication to third parties for marketing purposes" of the previous point 2., the processing may last, during the contractual relationship, until the withdrawal of consent and in any case not beyond 24 months from the termination of the contractual relationship or, in the absence of a contract, from the expression or renewal of consent, subject to the right to object at any time and to revoke the consent given by the Data Subject, according to the methods described in point 8 "DATA SUBJECT RIGHTS".

There are no automated decision-making processes, which may also occur through the cross-referencing of Personal Data collected in relation to the provision of the product and/or service and its use of multiple functionalities offered to the user and by using other identifiers (authentication credentials), necessary to trace back to specific, identified or identifiable subjects, specific recurring actions or behavioural patterns in the use of the functionalities offered (patterns).

6. DATA DISCLOSURE

The data collected and processed may be disclosed, exclusively for the purposes specified above, to:

- a) all subjects to whom the right to access such data is recognized by legislative, regulatory, and authorizing provisions;
- b) employees, collaborators, suppliers of the Data Controller, within the scope of their respective duties and/or contractual obligations relating to the execution of the contractual relationship with the data subjects; among the Data Controller's supplier subjects, for example, those who provide consulting and design services on behalf of the Data Controller or other subjects who perform activities on behalf of the Data Controller based on collaboration agreements, banking and credit institutions, trade associations, social security institutions, insurance companies, temporary employment agencies, legal consultants, lawyers, tax consultants and accountants, debt collection companies, private entities as managers of databases such as Credit Information Systems and/or other companies consulted to assess, acquire, or manage credit risk (or insolvency risks) and/or other financial risks etc.;
- c) public administrations and supervisory and control authorities;
- d) (if the Data Subject has given consent to purpose D) of the previous point 2.) companies entrusted with conducting personal or telephone interviews, questionnaires, online surveys;
- e) (if the Data Subject has given consent to purpose E) of the previous point 2.) controlling, controlled, and affiliated companies to the Data Controller company (therefore, hypothetically different from Intercompany services falling within the hypothesis b) above) and to third-party commercial partner companies.

The above-mentioned subjects will process the data as independent Data Controllers or as Data Processors or Authorized Persons for processing, specifically designated.

The Data Controller provides appropriate instructions to the Data Processor and Authorized Persons, if designated, aimed at adopting adequate security measures to ensure the confidentiality, security, and integrity of the data.

7. DATA PROCESSING LOCATION

The processing activity takes place within the territory of the European Union. There is no intention to transfer the data outside the territory of the European Union or to an International Organization.

In the event that it becomes necessary to process Personal Data in countries outside the European Union, the transfer will be regulated in accordance with the provisions of Chapter V of the GDPR and, therefore, on condition that an adequate level of protection of Personal Data is guaranteed, recognized by a specific adequacy decision expressed by the European Commission; and, in the absence of such adequacy decision, only if adequate guarantees of a contractual or regulatory nature are provided by the Data Controller and Processors involved, such as Binding Corporate Rules and standard contractual clauses for data protection.

8. DATA SUBJECT RIGHTS

The GDPR grants the Data Subject the exercise of their rights with regard to the Personal Data concerning them, and therefore refers to the GDPR, and in particular to articles 15-21 (the following summary description is indicative):

- a) access to personal data (the Data Subject will therefore have the right to obtain information about the Personal Data held by the Controller and their processing, as well as to obtain a copy in an accessible format);
- b) rectification of data (the Controller will, upon the Data Subject's request, correct or supplement the Data Subject's data - not expressing evaluative elements - that are incorrect or inaccurate, also becoming such because they are not updated);
- c) withdrawal of consent (if the processing is based on consent expressed by the Data Subject, the latter may withdraw consent at any time, without affecting the lawfulness of the processing carried out before the withdrawal);
- d) erasure of data (or right to be forgotten) (for example: the data are no longer necessary for the purposes for which they were collected or processed; they have been processed unlawfully; they must be erased to comply with a legal obligation; the Data Subject has withdrawn the expressed consent and there is no other legal basis for the processing; the Data Subject objects, under the conditions, to the processing, as per the subsequent letter f);
- e) restriction of processing (in certain cases - dispute about the accuracy of the data, in the time necessary for verification; dispute about the lawfulness of the processing with opposition to deletion; need of use for the Data Subject's rights of defence, while they are no longer useful for the purposes of the processing; if there is opposition to the processing, while the necessary verifications are being carried out - the data will be kept in such a way as to be possibly restored, but, in the meantime, they are not consultable by the Controller except in relation to the validity of the request for restriction, or with the consent of the Data Subject or for the verification, exercise, or defence of a legal claim or to protect the rights of another natural or legal person or for reasons of significant public interest of the Union or of a Member State);
- f) objection in whole or in part to processing for legitimate reasons (in certain circumstances, the Data Subject may object to the processing of their data, in particular, if the Data Subject's personal data are processed for direct marketing purposes, they have the right to object at any time to the processing, including profiling to the extent that it is related to such direct marketing. If personal data are processed for scientific or historical research or statistical purposes, for reasons related to the Data Subject's particular situation, they have the right to object to the processing, unless the processing is necessary for the performance of a task carried out in the public interest);
- g) data portability (if the processing is based on consent or on a contract but only if it is carried out by automated means, upon the Data Subject's request, they will receive their personal data concerning them in a structured, commonly used, and machine-readable format and may transmit them to another Controller without hindrance from the Controller to whom they were originally provided and, if technically feasible, may request that such transmission be made directly by the Controller);
- h) lodging a complaint with the supervisory authority (Italian Data Protection Authority - Garante per la protezione dei dati personali).

The Italian Data Protection Authority can be contacted through the contact details indicated on its website www.garanteprivacy.it.

For the exercise of their rights and for the withdrawal of consent given for the purposes indicated above in point 2., as well as for further information regarding their Personal Data, the Data Subject may send a communication, indicating the content of the specific request in the subject line, to the following contact email address:

rendueti@gmail.com.

Data Controller

Marchesini Pier Luigi, owner of the company "ELETTRAUTO DUETI di Marchesini Pier Luigi"