



In accordance with Regulation (EU) 2016/679 ("GDPR") and in compliance and for the purposes of the Leg. Decree Nr.196 30th June 2003 (**Personal Data Protection Code**) Adduma Car S.r.l. ("**Adduma Car**" or the "Data Controller") provides below the information on the processing of your personal data – obtained directly from you and/or obtained from third parties - to let you know our privacy policy, to understand how your personal information is processed when you use our services and to allow you to give an informed and specific consent to the processing of your personal data in the sections of the website www.addumacar.it and / or of the **App** "Adduma Car" where you may be required to provide such data.

Data Controller

The Data Controller is Adduma Car S.r.l., ("**Data Controller**"), with registered office in Via Sandro Pertini 6A – 50127 Firenze (FI) – VAT number: 01247570862 and can be contacted at the following address addumacar@legalmail.it.

The purposes of data processing and its legal basis

Adduma Car processes your personal data for the following purposes:

- I. *Necessary legal and contractual purposes - data processing is required to comply with the Data Controller's contractual or legal obligations, or to comply with a specific request of the data subject.*

Your personal data may be processed without your consent, in cases where this is necessary to fulfil the obligations of civil and tax law and EU legislation, as well as standards, codes or procedures approved by the Authorities and other competent Institutions. In addition, your personal data may be processed to comply with requests from the competent administrative or judicial authority and, more generally, public entities in compliance with the formalities of law. Your personal data will also be processed for purposes related and/or associated with the provision of services by the **Adduma Car**, in particular:

- for the fulfilment of obligations arising from the General Conditions ("GC" or "Contract"), the Regulations and/or the provision of ancillary and/or related services to these contracts and, more in general, for the fulfilment of legal, accounting, tax, administrative and contractual obligations related to the provision of the requested services. In these cases, we wish to inform you that, in accordance with the applicable data protection law, your consent is not required if the processing is necessary to fulfil contractual obligations or if the processing is necessary to fulfil your specific requests during negotiations and before the contract is signed;
- for the provision of services requested by the customer when registering on the website and/or App and the creation of your account and profile including the collection, storage and processing of data for the establishment and subsequent operational, technical and administrative management of the relationship (and the account and profile created by the customer) connected to the provision of services and the sending of communications related to the performance of services;

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- for the processing of payments (and the subsequent processing - under the terms of the law - of payment details, including credit card or prepaid card details) for requested services and any additional charges, in accordance with the General Conditions and/or other specific contractual conditions published on the website or in any other way made available to the client;
- for the management of relationships with third-party authorities and public bodies for purposes related to particular requests, fulfillment of legal obligations or particular procedures (i.e.: reassignment to the actual violator of the reports of violation of the rules of the Highway Code);
- for the setup of measures aimed at protecting against credit risk, including activities aimed at identifying the customer and its economic / solvency reliability also during the contractual relationship.

This data, which must be necessarily provided for implementing the operational, financial and administrative aspects of the service – will be processed using electronic instruments, recorded in special data bases and used strictly and exclusively within the scope of the contract. Because the communication of your personal data for the above purposes is necessary to the maintenance and provision of all services related to the contract, failure to do so will result in the specific services in question not being provided.

II. Commercial and marketing purposes – consent

Your personal data may also be processed, subject to your consent, for the following purposes inherent to the activity of the Data Controller or a third party:

- the marketing of the services of the Data Controller and/or a third party, the sending of advertising/information/promotional material and that relating to participation in initiatives and offers aimed at rewarding customers of the Data Controller;
- market research, financial analysis and statistics;

Consent to the processing of data and its communication to the parties shown below for the above purposes is optional and may be revoked writing to addumacar@legalmail.it

III. Exercise of a legal claim

In addition, your personal data will be processed whenever it is necessary to ascertain, exercise or defend a legal claim on the part of the Data Controller.

IV. Legitimate interest of the Data Controller

The Data Controller may process your personal data without your consent in the following cases:

- in the case of extraordinary business branch mergers, sales or transfers to allow the performance of due diligence and other operations prior to the sale. It is understood that only the data required for the above purposes will be processed in the most aggregated/anonymous form.

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- analysis of the use of car sharing service, to identify clients' consumer habits and preferences, to improve the services provided and to meet their specific requirements, or the preparation of initiatives related to the contractual relationship to improve the services provided, such as client feedback surveys;
- preparation of a vehicle geolocation system and any measures to protect the vehicle fleet against any act by clients that is illegal or fraudulent.

Recipients of personal data

For the purposes indicated above, the Data Controller may disclose your personal data to third parties, such as, for example, those belonging to the following categories:

- Police forces, the armed forces and other government bodies, for the fulfilment of the obligations envisaged by law, regulations or EU legislation. In this case, according to applicable data protection legislation, the prior consent of the data subject is not required;
- Companies, organizations or associations, or parent, subsidiary or associated companies under Article 2359 of the Civil Code, or between these and Adduma Car subject to joint control, and between consortia, business networks and groups, and temporary joint ventures and connected entities, limited to communications made for administrative and/or accounting purposes;
- Insurance companies responsible for the settlement of claims;
- Companies specialized in credit recovery;
- Companies specialized in the management of business information or related to credit, or advertising and promotion;
- Other companies that provide car sharing services with whom the Data Controller has agreements of various types;
- Other companies contractually bound to the Data Controller that provide claims management activity.

You may rest assured that the Data Controller will take the utmost care to ensure that the communication of your personal data to the above recipients involves only the data required to accomplish the specific purposes for which it is intended. Your personal data is stored in the Data Controller's database and will be processed exclusively by authorized personnel who will be given specific instructions on the methods and purposes of the processing. Your data will not be communicated to third parties, except as provided for above and, in any case, within the limits indicated. Finally, please note that your personal data will not be disclosed, except in the cases described above and/or as provided for by law.

Transfer of personal data outside the EU

In the context of the contractual relations between Adduma Car and its Data Processor Omoove S.r.l. ("Data Processor") your personal data may be transferred outside the EU, including through inclusion in databases shared and managed by third parties both within and outside of Adduma Car's scope of control. The management of the database and the processing of this data are performed only for the purposes for which it was collected and with maximum respect for the privacy and security standards

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described in applicable personal data protection laws. Whenever your personal data are transferred outside the EU, the Data Controller shall take every suitable and necessary contractual measure to guarantee an adequate level of personal data protection in accordance with this Privacy Statement, including, among other means, the Standard Contractual Clauses approved by the European Commission.

Data retention period

The data will be kept for no longer than required for the purposes for which it has been collected or processed, in accordance with the applicable legislation. Your data will be kept for ten years from the termination of the contractual relationship in order to allow Adduma Car to defend itself against possible claims in relation to the contract. At the end of this period, all data will be deleted or otherwise irreversibly de-identified, unless the continued retention of some or all of the data is required by law.

Rights of data subjects

As the data subject, you have the following rights concerning the personal data collected and processed by the Data Controller for the purposes listed above.

Right of access

You have the right to ask the Data Controller for confirmation that your personal data is being processed and obtain access to your personal data and the following information: (i) the purposes of the processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular if the recipients are in third countries or international organizations; (iv) when possible, the intended retention period of the personal data or, if this is not possible, the criteria used to determine this period; (v) the right to lodge a complaint with a supervisory authority.

Right of rectification and cancellation

You have the right to rectify any inaccurate personal data, as well as, taking into account the purposes of the processing, complete any incomplete personal data, including by providing a supplementary statement. You also have the right to obtain cancellation of your personal data for any of the following reasons: (i) your personal data is no longer required for the purposes for which it was collected or otherwise processed; (ii) the data was processed unlawfully; (iii) you have revoked your consent on the basis of which the Data Controller had the right to process your data and there is no other legal basis allowing the Data Controller to process it; (iv) you did not agree to the processing and there is no overriding legitimate reason to do it; (v) your personal data must be deleted to comply with a legal obligation. Adduma Car has the right, nevertheless, to waive these rights of cancellation if the right to freedom of expression and information prevails, or to exercise a legal obligation or defend a legal claim.

The right to data portability



You have the right to receive the personal data provided to the Data Controller and processed by it on the basis of consent, or other legal basis, in a structured, customary and readable format, as well as the right to transmit this data to another Data Controller without hindrance.

The right to restrict processing

You have the right to ask Adduma Car to restrict processing as follows: (i) for the period required by the Data Controller to verify your personal data when you have disputed its accuracy; (ii) if your personal data has been processed unlawfully; (iii) even if your personal data is not required for the purposes of processing but you need it to be processed for the determination, exercise or defense of a legal claim; (iv) for the period required to check on the possible prevalence of the Data Controller's legitimate reasons with respect to your opposition to the processing. You can exercise the above mentioned rights, by sending an email to the certified email address addumacar@legalmail.it. You also have recourse to the competent data protection authority if your data has been processed unlawfully.

Consent to data processing and the obligation of its communication

For the processing of the discretionary personal data listed above, Adduma Car requests your consent to process it only for the purposes respectively indicated in the consent form at the moment of the signing up. Should you not give your unambiguous consent for the processing of the discretionary data currently held by Adduma Car or that it may obtain in the future, you could be precluded from enjoying the benefits and/or effects related to the data processing, without this, however, having any effect on the contractual relationship and on the services provided by Adduma Car. When the request is made for your personal data, Adduma Car will inform you specifically of the mandatory or discretionary nature of the data request.

"Cookies" - Information automatically stored on your computer

When you visit our website, we may store some data on your computer under the form of "cookies". These cookies allow us to recognize your PC on your next visit. Cookies can help us in several ways, for example by allowing us to modify a website to react accordingly to your interests or to store your password in order to save you time every time you log in. If you do not wish to receive cookies, all you need to do is configure your Internet browser to delete all cookies from your computer's hard disk, block them or generate a warning message whenever you save one.

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