



Pursuant to art. 13 of the European Regulation 2016/679 (hereinafter the "GDPR") the following information is provided on the processing carried out by ADR Mobility S.r.l. in the context of calls to the Easy Parking call centre for information and parking bookings (telephone number 06.88981981).

## **1. DATA CONTROLLER**

The data controller is ADR Mobility S.r.l. with registered office in Via Pier Paolo Racchetti 1- 00054 Fiumicino, Rome (hereinafter the "Data Controller" or "ADR Mobility").

## **2. DATA PROTECTION OFFICER**

ADR Mobility has appointed a Data Protection Officer ("DPO"), who can be contacted at the following email address: [dpo@adr.it](mailto:dpo@adr.it)

## **3. TYPES OF DATA PROCESSED**

The data processed by the Data Controller may include personal and contact data, as well as reservation and vehicle data (e.g. first name, last name, e-mail address, telephone number and vehicle registration number) and all information relating to the reservation, information and parking service requests made. For the handling of requests, the Controller may need to process personal data of third persons, possibly even minors (family members, friends, colleagues of the applicant). To this end, the user undertakes to inform these parties of the processing carried out as set out below, including by providing them with this information notice.

## **4. PURPOSE AND LEGAL BASIS OF THE PROCESSING**

The personal data to be provided are processed by the Controller in order to fulfil the request made in connection with the reservation of an 'Easy Parking' car park via the channel indicated. For these purposes indicated, the provision of personal data is optional, but failure to provide it will not allow the Controller to provide the requested service. The processing of data is carried out in order to comply with a request for assistance/information from the data subject; therefore, the legal basis for the processing is the performance of contractual and pre-contractual measures referred to in Article 6(1)(b) GDPR.

The Controller shall record calls in the manner set out in paragraph 5 below, with the aim of guaranteeing and improving the quality of the service offered. Providing data for this purpose is optional and you may object to the processing by notifying the operator directly during the phone call. The legal basis for such processing is the pursuit of a legitimate interest of the Controller (i.e. ensuring the improvement of the quality of the service offered) in accordance with Article 6(1)(f) GDPR.

## **5. PROCESSING METHODS**

The data are processed in compliance with the regulations in force by means of manual, IT and electronic tools, with logic strictly related to the indicated purposes, so as to guarantee the security and confidentiality of the data. Calls are recorded in order to guarantee and improve the quality of the service provided. In any case, appropriate technical and organisational prescriptions shall be adopted by the Controller to make such processing comply with the relevant statutory and regulatory requirements.



## **6. NON-EU DATA TRANSFER**

Data will not be disseminated and/or communicated to third parties located outside the European Economic Area.

## **7. DATA RETENTION PERIOD**

Personal data is only processed for the time necessary to fulfil subsequent requests. Subsequently, they may be stored, in a manner that guarantees their confidentiality, in accordance with the provisions of the applicable prescription provisions.

With specific reference to call recordings for the purpose referred to in paragraph 3 above, these are retained for 90 days (the time required for the proper performance of operations to ensure the quality of the service with respect to user requests) and subsequently deleted.

## **8. DATA RECIPIENTS**

For the pursuit of the above-mentioned purposes, your personal data will be disclosed to the Controller's employees and collaborators, who will act as authorised processors.

In addition, the Data Controller, within the scope of the activities of receiving and recording calls referred to in this notice, makes use of:

- Numero Blu, appointed as data processor for this purpose, as the company entrusted with the call centre services, which may in turn avail itself of third parties appointed pursuant to Article 28, GDPR.

In fulfilment of possible legal obligations, the data may also be communicated by the Data Controller to the competent Public Authorities, which would act as (autonomous) data controllers.

Under no circumstances will your personal data be disseminated.

## **9. LOCATION OF THE CALL CENTRE**

With reference to the "New regulatory provisions on call centre activities Article 1, paragraph 243, of Law no. 232 of 2016" ADR Mobility informs that it uses, for all operator switchboard services, services located in Italy.

## **10. RIGHTS OF THE DATA SUBJECTS**

Finally, we would like to inform you that Articles 15-22, GDPR, give data subjects the possibility to exercise specific rights. In particular, the data subject may obtain, if the conditions and prerequisites set out in the GDPR are met, from the Data Controller: access, rectification, erasure, restriction of processing, revocation of consent as well as portability of data concerning him/her. The data subject also has the right to object to the processing of data at any time. In the event that the right to object is exercised, the Data Controller reserves the right not to proceed with the request and, therefore, to continue the processing, in the event that there are compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedom of the data subject. The above rights may



be exercised by making an informal request to the Data Protection Officer (DPO) at [dpo@adr.it](mailto:dpo@adr.it). The contact details of the Data Protection Officer are available at [www.adr.it](http://www.adr.it).

## **11. CHANGES TO THE POLICY**

The Controller reserves the right to amend and update this policy over time.

Last updated in February 2023