

## PRIVACY POLICY

Pursuant to Art. 13 of EU Regulation 679/2016 and applicable privacy provisions

### Company car

#### Introduction

Pursuant to and for the purposes of EU Regulation no. 679/2016 ("**Regulation**") and any other EU or national provision and/or regulation applicable to the protection of personal data, **TECON S.R.L.**, Strada 1 Palazzo CC 20057 Assago (MI), e-mail: [tecon@teconsrl.it](mailto:tecon@teconsrl.it); tel. 0292882150, in its capacity as data controller ("**Company**" or "**Controller**"), informs you that the personal data acquired as part of the employment relationship for the purpose of providing you with a company car, as well as any other data collected relating to the use of said car ("**Data**"), may be processed in compliance with the following.

#### 1. Purposes and legal basis of the processing

Your personal data will be processed for the following purposes:

- (i) the provision of a company car to you (whether for mixed-use, for specific trips or for other reasons such as *fringe benefits*);
- (ii) the performance, by the Company, of administrative and accounting activities strictly related to the proper management of the provision of the company car (e.g. to send you traffic fines, for the possible replacement of the car, to calculate the annual deduction related to the car's mileage allowance, for the management of expense reports related to the use of the car, etc.).

The legal basis for the processing of Data aimed at the pursuit of the above purposes is the provision and proper management of the car assigned to you as part of the employment contract executed between you and the Company;

- (iii) the assessment - in accordance with the requirements of Italian Legislative Decree No. 81/2008 for employers - of the risks arising from the use of company vehicles, as well as any inspections, including on the use of the vehicle, required to ensure adequate safety conditions.

The legal basis for the processing of Data for this purpose is the fulfilment of the obligations established by the law and applicable regulations;

- (iv) the management of disputes, in the event of claims, fines, litigation and/or settlements relating to the use of the car assigned to you.

The legal basis for the processing of the Data is the pursuit of a legitimate interest of the Company and/or third parties (e.g. in the event of litigation), which, based on the assessments made by the Company, does not adversely affect your rights.

#### 2. Nature of data provision and consequences of failure to provide data

For the performance of the purposes set forth above, the provision of Data is necessary; refusal to provide it would make it impossible for the Company to assign the company car to you.

#### 3. Categories of persons/entities to whom the data may be disclosed

For the purposes outlined above, your data may be disclosed:

- (i) to companies belonging to the same corporate group as the Controller;
- (ii) to the rental company providing the cars to the Controller;
- (iii) to insurance companies, for the handling of any claims related to the cars, and to the persons and/or companies involved in the ordinary and extraordinary maintenance and servicing of the cars;
- (iv) to persons, companies, associations, or professional firms providing assistance and consultancy services or providing services to the Controller, with particular (although not exclusive) reference to accounting, administrative, legal, tax and financial matters.

(v) Bodies and/or public authorities authorized by law.

The persons/entities belonging to the above categories will use the Data in their capacity as autonomous controllers or processors, in the latter case subject to an appointment pursuant to Art. 28 of the Regulation.

The Data may also be brought to the attention of our personnel who will process it in their capacity as persons entrusted with data processing.

#### **4. Data retention period**

The Data will be processed for the entire duration of the employment relationship with our Company, after which they will be retained in compliance with the ordinary limitation periods set forth in the Italian Civil Code or specific provisions of law, for administrative purposes and/or to enforce or defend legitimate rights or interests, and it will be deleted when the purposes for which it was collected no longer apply.

#### **5. Data subjects' rights**

We inform you that, in the cases expressly provided for in the Regulation, you may exercise the rights set out in Art. 15 et seq. of the Regulation and precisely you may:

- (i) request confirmation that the Data is being processed and, if so, ask the Controller for access to information relating to such processing;
- (ii) request that incomplete or inaccurate Data is rectified;
- (iii) request the Controller to delete the Data;
- (iv) request the restriction of the processing;
- (v) request to receive, in a commonly used and machine-readable format, the Data concerning you or to obtain that such Data is transmitted directly to another controller, where technically feasible (so called '*data portability*').

In addition, you have the right to object, either wholly or partially, for legitimate reasons, to the processing of the Data that concerns you.

The aforementioned rights may be exercised by sending a request to the e-mail address: [tecon@teconsrl.it](mailto:tecon@teconsrl.it).

Finally, if you consider that the processing of the data provided violates the data protection legislation, you have the right to file a complaint with the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

#### **6. Policy update**

This policy was updated in May 2024.

#### **The Controller**

**Tecon S.r.l.**