

**NOTICE PURSUANT TO ART. 13 AND 14 OF REG. (EU) 2016/679 ON THE PERSONAL DATA OF CUSTOMERS  
OF LOCAL PUBLIC TRANSPORT SERVICES**

**1) Introduction and identification of the personal data processing figures**

AUTOGUIDOVIE S.p.A. collects and processes a series of personal data of customers who use the local public transport services provided by it.

This document aims to provide these interested customers with information regarding the processing of their personal data, in a concise, transparent, intelligible, and easily accessible form, in the simplest and clearest possible language.

The data controller is AUTOGUIDOVIE S.p.A., tax code no. 00103400339, REA Milan no. 103484, VAT number no. 11907120155, can be contacted at tel. +39025803971, email [autoguidovie@pec.it](mailto:autoguidovie@pec.it). The Data Controller has designated a Data Protection Officer (DPO) who can be contacted at the telephone number +39025803971 or at the e-mail address [privacy@autoguidovie.it](mailto:privacy@autoguidovie.it).

**2) Processing of data communicated by customers for the purchase and use of travel tickets**

AUTOGUIDOVIE S.p.A. processes the data provided by customers for the purpose of purchasing and using some of the travel tickets for public transport services (such as bus pass, cards) and, where applicable, making travel reservations using AUTOGUIDOVIE app.

Specifically, these data are identification data (such as name, surname, gender, date and place of birth and residence, citizenship, tax code, photo and activity as a worker or student and, in the latter case, the institute and class attended) and contact details (such as address, telephone numbers and e-mail), the travel route of interest, payment data (amount and date of transactions, last 4 digits of the credit card and expiry date), which the individual person concerned communicates to AUTOGUIDOVIE S.p.A. to request the issuance of certain travel documents or to book the service.

This data processing has, therefore, the purposes of the purchase by the customer of the travel document and the verifications of effective regularity of the same and, where applicable, the booking of the trip through the AUTOGUIDOVIE app and is, therefore, necessary to access to the public transport service provided by AUTOGUIDOVIE S.p.A. through these titles. In the absence of such data, the indicated travel documents cannot be issued and used and/or it will not be possible to book the trip.

The legal basis of the data processing is, therefore, the need to satisfy the request for the issue of travel tickets of the data subject as well as the fulfilment of the relative transport contract with the same.

Personal data processed for legal and contractual obligations will be retained for 10 years from the end of the validity of the last purchased ticket, without prejudice to any retention periods provided for by law or regulations. Stamping data may be retained for a period not exceeding 8 days.

### **3) Processing of personal data for marketing purposes**

AUTOGUIDOVIE S.p.A. it can also process the data indicated above for direct marketing aimed at its customers, who are in any case guaranteed the right to oppose such processing, at any time and free of charge. In the event of opposition, the customer's personal data will no longer be processed for these purposes.

The legal basis of the processing is constituted by the legitimate interest of the data controller in carrying out direct marketing initiatives towards its customers, in consideration of the relationship established with them and the protection of their fundamental rights and freedoms guaranteed also through the right of opposition mentioned above.

Personal data processed for direct marketing purposes will be retained for 2 years from the last commercial interaction with the Customer.

Only if the customer expressly consents, the contact data indicated above can be processed by AUTOGUIDOVIE S.p.A. for purposes of information or commercial promotion of products by AUTOGUIDOVIE S.p.A. and/or other subjects such as companies belonging to the Group of AUTOGUIDOVIE S.p.A. as well as by the entities signing the local public transport service contract and by the integrated carriers, to whom personal data may be communicated for processing in compliance with the applicable rules, as also indicated in the context of the declaration of the specific consent that the customer concerned may freely lend or not lend, without this having consequences on the possibility of purchasing travel tickets and accessing the local public transport services provided by AUTOGUIDOVIE S.p.A.

Personal data processed with the consent of the interested party for information or commercial promotion purposes will be retained until the consent is revoked.

### **4) Processing of images acquired by video surveillance systems**

On board the vehicles used by AUTOGUIDOVIE S.p.A. to provide local public transport services, video surveillance systems are in operation which film the interior and immediate vicinity of the vehicle itself, with the aim of guaranteeing safety and protecting the assets of the people present, as well as protecting the assets used for the provision of the service. On board the vehicles are posted the video surveillance information pictograms, which informs customers of the use of video surveillance. Through these systems, therefore, AUTOGUIDOVIE S.p.A. acquires and processes the personal data consisting of the images of the customers of the local public transport services.

The legal basis of the processing in question is the need and the related legitimate interest to prevent and combat any offences.

The images processed by video surveillance systems will be stored for 7 days, unless there is a need for storage by order of an authority or to defend the rights of the Data Controller in all locations.

## **5) Processing of data related to complaints or requests for indemnity / reimbursement / compensation**

In case of receipt of reports, complaints or requests for indemnity / reimbursement / compensation in relation to the army local public transport service, AUTOGUIDOVIE S.p.A. processes personal data communicated in this way only if concretely permitted by the applicable rules and for the sole purpose of managing the complaint / request for compensation.

The categories of interested parties and data subject to the described processing are determined by the author of the report, complaint or request, under his own responsibility. The subsequent processing of personal data by AUTOGUIDOVIE S.p.A. will take place exclusively in compliance with the applicable rules.

The legal basis of this treatment is the need to satisfy the request for management of the report, complaint, or request.

Personal data processed for legal and contractual obligations will be retained for 10 years, without prejudice to any retention periods provided for by law or regulations.

## **6) Personal data communicated by the customer in the context of contesting violations and applying administrative sanctions**

AUTOGUIDOVIE S.p.A., as required by current regulations on local public transport (by the Lombardy regional law n. 6/2012, art. 46, and regulations referred to therein), is required and entitled to verify the possession and regularity of travel documents by the customers of the service. In this context, AUTOGUIDOVIE S.p.A. processes the identification data (such as name, surname, date and place of birth and residence and tax code) and contact data (such as address, telephone numbers and e-mail) of customers who appear to have irregularities with respect to the possession of travel documents, with the purpose of contesting the relevant violations and applying the related administrative sanctions. These data must be provided by the data subject to allow AUTOGUIDOVIE S.p.A. to implement the rules referred to above and, in the absence of communication, the intervention of the competent Authorities may be requested.

The purpose of this treatment is the prevention / contrast of any offenses and fare evasion as well as in the pursuit of one's legitimate interest in the regularity of payments of travel tickets.

The legal basis of the processing in question is the need and the connected legitimate interest to prevent and combat any crimes, as well as to ensure the regularity of payments relating to travel tickets for the local public transport service.

Personal data processed for legal and contractual obligations will be retained for 10 years, without prejudice to any retention periods provided for by law or regulations.

## **7) Personal data processed for the purpose of electronic transmission to the Revenue Agency of data relating to expenses for the purchase of season tickets for local public transport services**

AUTOGUIDOVIE S.p.A., as required by the current regulations concerning tax simplification and the pre-filled tax return, is required to electronically transmit to Agenzia delle Entrate the data relating to expenses and reimbursements incurred by natural persons for the purchase of season tickets for local public transport services, accompanied by the relevant documentation, for the purposes of processing the pre-filled tax return. This transmission concerns only the expenses incurred for the purchase of season tickets carried out using methods that require the registration of the interested party's identification data and contains exclusively the data relating to expenses incurred for purchases made with bank or postal transfers or through other payment systems other than cash.

The interested party may express opposition to the inclusion in the pre-filled declaration of data relating to expenses for the purchase of season tickets for local public transport services:

- at the time of incurring the same, by selecting the appropriate checkbox in the case of digital purchase from the TPLWEB site or AUTOGUIDOVIE App or by communicating the opposition to the operator in the case of purchase at the point of sale;
- by communicating the opposition in written form to AUTOGUIDOVIE BUS S.p.A. at the contact details indicated in this information by 31 December of the year in which the expense was incurred.

The legal basis of the processing in question is, therefore, the fulfilment of a legal obligation.

The data may be retained until the maximum expiry terms provided for in the matter of income tax assessment (therefore, until 31 December of the sixth year following each tax year), and, upon expiry, they will be completely and automatically deleted, while the data relating to the subjects who have exercised opposition will be promptly and completely deleted.

## **8) Methods of data processing and data retention**

Personal data covered by this information are processed, both on paper and electronically, and with the adoption of appropriate measures to ensure their protection. Personal data may be shared, in compliance with the applicable rules and only for the purposes and under the conditions indicated in this information, with public subjects for legal obligations, or with data processors or co-controllers with whom specific agreements have been signed.

The personal data covered by this information will be stored by AUTOGUIDOVIE S.p.A. for the time necessary to achieve the purposes above specified for the related data processing.

In the event of a dispute with a data subject or a specific request from the competent Authorities, personal data may be kept for as long as necessary to protect the interests of the Data Controller or to comply with the request of the Authority.

## **9) Rights of the data subject**

The data subject, i.e., the natural person to whom the personal data refer, has the right to ask the Data Controller for access to their personal data, the rectification or cancellation of the same, as well as to request the limitation or oppose their treatment. The data subject is also the holder of the right to data portability.

To exercise these rights, you can refer to the contacts indicated in this statement. All requests received will be processed and verified in accordance with the specific provisions of the applicable regulations, also with reference to the effective existence of the conditions for their acceptance.

To manage requests, it may be necessary to ascertain the identity of the applicant, as a security measure to prevent the personal data processed from being disclosed to subjects who are not entitled to know them. For the same reasons, it is possible that those who make the request will also be contacted to provide any clarifications regarding the request made. The exercise of rights is not conditional on a payment; however, the Data Controller reserves the right to charge the costs and expenses incurred to manage requests that are clearly specious, unfounded, repetitive, excessive or have the sole purpose of hindering the activity of the Data Controller, the pursuit of one's legitimate interests or the exercise of one's rights. In such cases, the Data Controller may also not process or reject the requests.

AUTOGUIDOVIE S.p.A. makes every effort to respond to legitimate and well-founded requests within one month of receiving them. Depending on the complexity and number of requests, as well as the above, this deadline may be extended by two months.

At the outcome of the management of the request and against the same, the data subject has the possibility to lodge a complaint with the supervisory authority and to lodge a judicial appeal.

In cases where the processing of personal data is based on the consent that the data subject has expressed, the same has the right to revoke it at any time but without prejudice to the lawfulness of any previous treatment. In the case described, however, the purpose of the treatment itself could be jeopardised.

Last upgrade on: 31/12/2024