# VEHICLE REMOVAL AND STORAGE

# PRIVACY POLICY PURSUANT TO ARTS. 13 AND 14 OF EU REGULATION NO. 679/2016 (GDPR)

### DATA CONTROLLER AND CONTACTS

The Data Controller is Azienda Trasporti Milanesi S.p.A. (ATM), with registered office in Foro Buonaparte 61, 20121, Milan (Italy). The Data Protection Officer, whom you can contact to exercise your rights under art. 13 and/or for any clarifications regarding personal data protection, can be contacted at the following email address: rpd@atm.it.

#### PURPOSE OF TREATMENT AND LEGAL BASIS

The purpose of the processing is the forced removal and storage of vehicles and related administrative activities. The legal basis is a legal obligation (Italian Legislative Decree no. 285 of 30 April 1992 and subsequent amendments) and the execution of the service contract with the Municipality of Milan for the concession of services related and complementary to local public transport.

#### CATEGORIES OF DATA PROCESSED AND RECIPIENTS

Data processed are ordinary personal data. Personal data are processed by personnel authorized by the data controller and may be communicated to companies supplying goods and/or services related to the processing. An example of these are the company providing the removal service and the company managing the storage depot.

#### METHODS OF PROCESSING AND POSSIBLE TRANSFER OF DATA

The data are processed only for the purposes mentioned above and according to the principles of lawfulness, correctness, transparency, accuracy, integrity and confidentiality, established by the regulations in force. The personal data management may also take place through automated and computerized processes. The personal data collected will not be transferred outside the European Economic Area.

## DATA RETENTION PERIOD

The data will be kept for 10 years, except in the case of litigation, in which the data will be kept until the judgement becomes final at all levels of judgement provided for by the applicable judicial system.

## DATA SUBJECT RIGHTS

All the rights of the data subject are guaranteed in accordance with the provisions of Articles 15, 16, 17, 18, 20, 21, 22 and 77 of the GDPR:

- right of access to your personal data and all information on the processing carried out;
- right to rectification of inaccurate personal data and integration of incomplete data;
- right to erasure ('right to be forgotten');
- right to limit the processing of your personal data;
- right to data portability;
- right to object to the processing of your personal data;
- right not to be subject to a decision based solely on automated processing;
- right to lodge a complaint with the Italian Data Protection Authority in case a violation is thought to have been carried out.