

## **Privacy Policy pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR")**

Dear Customer,

the KINTO Italia S.p.A. Company, in thanking you for showing interest in KINTO Share, would like to inform you that the proper handling of your Personal Data (as identified in point 3 below) and the trust you place in KINTO products and services are our priority: it is precisely with this in mind that we will collect, use, transfer and store your data.

Receiving information, in a transparent manner, about how we treat and protect your Personal Data is your right.

Therefore, please take a few minutes to read this privacy policy ("**Policy**").

The Notice is provided pursuant to Legislative Decree no. 196 of June 30, 2003 ("**Privacy Code**"), EU Regulation no. 679/2016 ("**GDPR**") and subsequent national adapting regulations (jointly "**Applicable Legislation**"), and relates exclusively to personal data collected to access and use KINTO Share car sharing services (hereinafter "**KINTO Share**") provided through the use of the mobile application of the same name (hereinafter "**App**"), or the web portal of the same name (hereinafter "**Web Portal**" or "**Web**") accessible from <https://www.kinto-share.it/>.

### **1. To whom you will confer your data? Who will process them?**

The company KINTO Italia S.p.A. (hereinafter "**KINTO Italia**" or the "**Data Controller**") is the entity that defines the ways and means by which your Personal Data will be processed.

For any clarification or request regarding the processing of your Personal Data, you can contact KINTO Italia at the following references:

- Phone: +39 06/548981
- E-mail: [support.share@kinto-mobility.it](mailto:support.share@kinto-mobility.it)
- PEC: [kintoitalia@legalmail.it](mailto:kintoitalia@legalmail.it)
- Address: KINTO Italia S.p.A. - Via Kiiciro Toyoda, 2, 00148, Rome, RM, Italy

KINTO Italia has appointed a Data Protection Officer ("DPO"), who can be contacted for any clarification or request regarding the processing of your Personal Data at the following e-mail address: [dpo@kinto-mobility.it](mailto:dpo@kinto-mobility.it).

### **2. What data do we ask, collect and/or process from you?**

In order to enable your registration and use of KINTO Share, certain information is collected that directly or indirectly enables your identification ("**Personal Data**").

In particular, the Personal Data that will be requested from you, listed below, may be entered through the following means:

- Contact Data: e-mail address and cell phone number will have to be entered manually.
- Image of the face (to be compared with those on the documents specified below): the image of the user will be acquired during registration by the user himself/herself with the cell phone (selfie).
- Data related to an identification document (Identity Card or Passport): the document will have to be photographed and the system will acquire from the same by automatic reading, when possible, the number, expiration date and country of issuance, in addition to the biographical data available on the document among those below.
- Driver's license data (category B or equivalent): the document should be photographed, and the system will acquire from the same by automatic reading, when possible, the identification number, expiration date, country of issuance, and the biographical data available on the document from among those below.
- Biographical data (as indicated on the documents): in case the information related to first name, last name, date of birth, gender, address, zip code and state cannot be acquired automatically from the documents, it will have to be entered manually.
- Tax code: this information must be entered compulsorily by manual typing, automatic reading from the identification document or by using a special calculator, available during registration, supplementing the information listed above with the city and province of birth.
- Data related to your professional activity (Professional title; VAT number; PEC address; SDI): this information will be further requested from the user and must be released only if you choose to register by creating a professional account (reserved for freelancers, companies and their employees).

- Payment data (payment method; transactions made): it will be necessary to enter data related to a valid card (or other payment method) from which the system will be able to read the number, holder's name, verification code and expiration date.
- Data related to the vehicle and its use: kilometers driven (so-called "geolocation," referred to in Sec. 3.2).

### **3. For what purposes do we process your Personal Data? What are the legal bases of our processing?**

#### **3.1. Follow up on your requests for enrollment and use of the KINTO Share service, via Web Portal and/or via App, and manage the resulting contractual relationship**

- We will process your Personal Data to:
- allow you to register for the service and create an account through the Web Portal or App;
- authenticate you by comparing the uploaded image and verifying the validity of the documents provided to create the account and access the service (such as an ID, tax code, and driver's license).
- monitor the validity of the information and retain the images, data and ID numbers of these documents for possible requests from the Authority and/or other legal obligations;
- manage your reservation requests through the App or Web Portal, tracking your reservation history, vehicles used and duration of use;
- allow you to carshare vehicles from the KINTO Share service and manage your account through the App or Web Portal;
- handle your possible support requests and/or complaints to our customer service department;
- keep you updated on changes to the KINTO Share service's Rules of Use and/or Terms and Conditions;
- update you on your use of KINTO Share through, for example, e-mail messages notifying you of bookings made and/or rentals completed;
- manage KINTO Share service charges and payments and related billing activity, including the recovery of any outstanding amounts, including with respect to the payment of costs associated with excess mileage;
- prevent, on the basis of total mileage data, situations in which you may not be guaranteed the services and benefits stipulated in the contract (for example, we may contact you if you are about to exceed the stipulated mileage limits, or to ensure the routine maintenance of the vehicle in order to maintain its safe condition, on the basis of what is stipulated in the contract)
- manage and respond to any of your requests;
- manage and delete your account.

For the achievement of the aforementioned purposes, the legal basis under Art. 6(1)(b) of the GDPR consists in the necessity to carry out the pre-contractual and contractual activities for the purpose of providing the services related to the use of KINTO Share as described in the Terms and Conditions of Service (available in the App and the Web Portal).

Regarding the cases listed above, failure to provide your Personal Data, will result in the inability to create an account and proceed with the proper provision of services.

#### **3.2. Geolocalization**

In order to properly provide carsharing services and to locate the vehicle used in case of any unlawful acts or accidents, the Owner will use geolocation data related to the location of the vehicles.

This information will also be visible on the mobile device (*smartphone*) you use to book the vehicles and will allow you to view your location in relation to that of the vehicle you have chosen: your location data will be visible only to you and the Holder will not be able to access it in any way.

Information regarding the location of pick-up and drop-off of vehicles used for KINTO Share carsharing will be accessible to the Data Controller and the following parties:

- **Data Processing Respondent specifically appointed by the Data Controller:** this person will be able to access the data collected from the vehicle in cases where an accident or emergency occurs. In such cases, in fact, the geolocation system present on the vehicle is interrogated by acquiring the position of the same.
- **Data Controller:** the acquisition of vehicle location information by the Data Controller is carried out only in cases where there are serious and proven suspicions of theft or fraud or at the request of local authorities or data subjects.

The subjects listed above at the request of the customer or in case of suspicion of car theft, will be able to retrieve the last position of the vehicle: since the GPS position is transmitted from the vehicles every 20 seconds, it will be possible to view and consult

the entire itinerary of a trip made by a given vehicle. This activity will involve further processing of your Personal Data, which will be carried out ensuring at all times the transparency, lawfulness and proportionality of the processing carried out.

For the above purposes, the processing of geolocation data will be carried out in cases of specific requests from users, in accordance with Art. 6, par. 1, let. b) of the GDPR, in order to ensure the proper performance of pre-contractual and contractual activities for the purpose of providing services related to the use of KINTO Share.

In cases where, on the other hand, the processing is necessary in order to comply with specific requests from local or national authorities, it will be carried out in accordance with Art. 6(1)(c) of the GDPR in order to comply with and/or execute a legal obligation as better specified in Section 3.3 below.

### **3.3. Fulfilment of legal obligations**

We will process your Personal Data, in accordance with Art. 6(1)(c) of the GDPR, to manage relations with third party authorities and public bodies for purposes related to particular requests, fulfilment of legal obligations or particular procedures (e.g.: renotification to the actual offender of reports of violations of the Highway Code, communication to the requesting Public Authorities, etc.).

### **3.4. To let you know about our best offers and/or services in a timely manner and to know your opinion about our products and services ("marketing purposes and marketing market surveys")**

Subject to your specific consent, we will process your Personal Data to send you commercial offers related to KINTO Share, as well as to send you surveys and market research, in order to keep you constantly updated on KINTO brand products and services and improve the quality of them.

The Personal Data you provide will be used to contact you through various automated means such as, e-mail, SMS, push notifications and in-app. In relation to these contact methods, you will have the option at any time to deactivate the methods through which you do not wish to receive commercial communications, by sending an email to the Owner's contacts, specified in the "Contact Us" section of this Policy.

The legal basis for the processing is, according to Art. 6(1)(a) of the GDPR, your specific consent, which will be specially collected, and can be revoked, through the App or the Web Portal.

### **3.5. Profiling**

Subject to your specific consent, we will process your Personal Data to analyze your preferences, habits and activities in the App, in order to send you personalized communications, in line with your tastes and increasingly responsive to your interests and needs (i.e. profiling), to guide you in the customer journey and propose you commercial offers on KINTO products and services.

The legal basis for this processing is, according to Article 6(1)(a) of the GDPR, your specific consent, which will be specially collected.

### **3.6. Soft Spam**

We will send you, exclusively via the e-mail address you provide, commercial information regarding new services and/or features of the App like and in line with those previously offered by KINTO Italia (so-called "Soft spam").

KINTO Italia assures you that contact, for this purpose, will only be by e-mail, and recognizes that you have the option to opt out of receiving such communications at any time and to notify us by written request to [support.share@kinto-mobility.it](mailto:support.share@kinto-mobility.it). In that case, following your request, no further communication for these purposes will be sent.

The legal basis for this processing purpose is, pursuant to Article 6(1)(f) of the GDPR, the need to protect a legitimate interest of the Data Controller; the protection of such legitimate interest would not be possible without using your Personal Data.

### **3.7. Disclosure to Toyota Group Companies for Marketing Purposes**

Only subject to your specific consent, the Personal Data you provide will be communicated to Toyota Group companies (Toyota Motor Italia S.p.A.; Toyota Financial Services Italia S.p.A.; Toyota Insurance Management SE and Aioi Nissay Dowa Insurance Company of Europe SE) which will process them as autonomous data controllers for sending commercial communications about their products and services.

The legal basis for the processing is, according to Art. 6(1)(a) of the GDPR, your specific consent, which will be specially collected, and can be revoked, via the App or the Web Portal.

### **3.8. Conduct market surveys in relation to mobility services ("survey purposes")**

Subject to your specific consent, we will process your Personal Data to send you surveys and/or questionnaires, in order to conduct surveys and market research in relation to mobility services such as, for example, long and medium term rentals, car sharing, carpooling, parking payment apps, and to purchase tickets for multiple modes of transportation.

The legal basis for the processing is, according to Art. 6(1)(a) of the GDPR, your specific consent, which will be specially collected, and can be revoked, via the Web Portal or by writing to the following e-mail address [support.share@kinto-mobility.it](mailto:support.share@kinto-mobility.it).

### **3.9. With reference to navigation data and cookies, ensure the proper functioning of the Site and the Web Portal, and in some cases, with your consent, use them in conjunction with your Personal Data to send you personalized offers and ensure navigation tailored to your needs.**

When you browse our Site (<https://www.kinto-share.it/>) and Web Portal, the computer and software systems responsible for its operation acquire certain data.

This is information (such as, for example: IP address, location, pages visited, access time, browsing time on each page) that by its nature is not associated with a specific natural person. This data - which is anonymous data - is used for the sole purpose of obtaining statistical information and to control and/or ensure the proper functioning of the Site. No consent is therefore required. In addition, cookies are activated during navigation, which are also by their nature data that cannot be directly traced back to a specific natural person.

For the type of cookies, their consent and their management, we invite you to consult our cookie policy at the following link: <https://www.kinto-mobility.it/cookie-settings>.

### **3.10. Conduct research and technical studies in order to improve the quality of our products/services and develop new ones.**

With a view to continuous improvement (Kaizen), which has always distinguished the companies of the Toyota Group, of which KINTO Italia is a part, we may use - even in anonymous and/or aggregate form - the data relating to your account, your rentals and the history of your use of the KINTO Share service to:

- verify, including through surveys, the quality of service provided to you and your level of satisfaction.
- improve the performance of Toyota and Lexus vehicles, mobile Apps, existing products and services or develop new ones;
- conduct research, development, data analysis and user group profiling to improve KINTO Share and develop new mobility services and solutions;
- protect, maintain and support our networks, systems and Applications.

The above data, for internal administrative statistical purposes only, may be disclosed to other Toyota Group companies.

In order to achieve the above purposes, the legal basis, pursuant to Article 6(1)(f) of the GDPR, consist in the existence of and the need to protect a legitimate interest of the Data Controller; the protection of such legitimate interest won't be possible without the use of your Personal Data.

## **4. How do we process your Personal Data? Who do we use to do this?**

We will process your Personal Data by manual, computer or telematic means, and in all cases suitable to ensure its security and confidentiality.

When you register for the App or Web Portal, the Personal Data you need may be entered manually or, alternatively, through an Optical Character Recognition ("OCR") technology. This system will process the images of the documents you photographed or scanned (ID Card, Driver's License) to extract the information contained therein and automatically enter it into the biographical fields provided on the App or Web Portal.

In addition, the system will compare the photo of your face with the one on the uploaded documents in order to confirm your identity and proceed with registration.

Regardless of how the data is uploaded (manual or automated - OCR), you will always be assured the ability to access the data and the right to modify it where it is incorrect or out of date, via App, Web Portal or by contacting customer support. Following image capture, images will be automatically deleted from the OCR and image comparison technology provider's systems.

In any case, the extraction and processing of images will not involve the processing of biometric data referable to you (Art. 9 of the GDPR) and only Personal Data necessary for the pursuit of the purposes listed above will be collected.

The processing will be carried out by personnel that we have duly instructed and trained or, in the case of external providers, properly contracted (see point 5).

Your Personal Data may be made visible and stored in a management platform as well as possibly stored in one or more special archives or databases of Toyota Group companies.

We also inform you, that telemetry equipment will be installed in the vehicle that acquires information about the position of the vehicle and driving conditions such as, but not limited to, acceleration and braking. This information is collected and processed through the aforementioned apparatus in order to enable the Holder to provide for the proper management of the vehicle and the provision of certain additional services (such as, for example, roadside assistance).

A connectivity apparatus will be installed inside the vehicle that shares the following data with KINTO Italia:

- mileage information, in order to charge and bill monthly for any excess mileage.
- geolocation of the vehicle, only at the request of KINTO Italia and in case of insolvencies. The location of the vehicle will be shared via special computer system, not on a continuous basis.

The sharing of the above information ("**Connected Services**") is made possible through a special agreement between KINTO Italy and Toyota Motor Europe NV/SA ("TME"). Your individual rental data will be processed by TME as the data controller. In addition, this apparatus allows you to quickly contact help by means of a special "SOS" button located in the passenger compartment of the vehicle. The set of services provided in cases where the vehicle used for rental is equipped with the aforementioned apparatus ("Connected Services") is provided by Toyota Motor Europe NV/SA (TME). In cases where the vehicle is equipped with Connected Services, the data relating to your individual rental will be processed by TME as an Autonomous Data Controller and will only be shared with us upon your specific consent. For more information on the use, access and processing of your personal data through the Connected Services, please review the appropriate Privacy Policy provided by TME at the following address: <https://www.toyota-europe.com/legal/data-privacy-policy>.

## **5. To whom are your Personal Data disclosed? Why? Where are they processed? Do we disclose it?**

(A) Your Personal Data, for the specific operations defined in Appropriate Agreements, will be shared with the operators of the official Toyota, Lexus and KINTO network (e.g., Dealers), appointed by the Data Controller as Personal Data Processing Respondent.

Special assignment, again with the above limitations, has also been given to some carefully selected service providers, including those who manage the platform through which the KINTO Share service is provided, as well as those who manage the electronic rental payment system.

All such entities, when necessary to fulfil your requests or for the other purposes described herein, will access and process your Personal Data to the extent described in the Appropriate Appointments.

The full list of the entities to whom, in various capacities and for the purposes indicated above, the Data Controller communicates your Personal Data, may in any case be requested without formality through the contact details indicated in point 1.

In particular, your Personal Data, or only some of your Personal Data, may be disclosed to the following third parties:

- (i) to third parties who provide services related to the Owner's businesses with respect to KINTO Share, and with whom specific agreements have been signed pursuant to the Applicable Regulations. These are first and foremost the French company Vulog SA - which provides the management platform for the KINTO Share service and performs all the activities necessary to manage the KINTO Share platform and database (whose servers are based in Germany), as well as troubleshooting that require the specific know-how of that provider and a specific IT infrastructure that cannot be replicated internally - as well as other companies that provide the software for data management and storage.
- (ii) to Dealers and Authorized Service Centres in the Toyota, Lexus and KINTO network that make KINTO Share service vehicles available or perform maintenance and service services on the vehicles themselves;

- (iii) to the companies that maintain and manage the electronic payment system through which the amounts due from customers for using the service are paid;
- (iv) to the suppliers who manage the administrative penalties related to the circulation of vehicles;
- (v) to suppliers, and Toyota Group companies, that handle the collection of any debts owed to customers;
- (vi) to companies that handle KINTO Share customer service and roadside assistance service;
- (vii) to the other Toyota Group companies (specifically: Toyota Motor Italia S.p.A., Toyota Motor Europe NV/SA (TME); Toyota Sweden, Toyota Financial Services Italia S.p.A., Toyota Insurance Management SE, Aioi Nissay Dowa Insurance Company of Europe SE): this is for accounting requirements, to manage the payment of KINTO Share services and/or to comply with industry regulations;
- (viii) to mobile network operators who support the on-board navigation system necessary for KINTO Share to operate effectively: in order for mobile network operators to comply with their legal obligations, which require that they obtain certain identifying information about you, we will collect such identifying information and provide it to the mobile network operator;
- (ix) to outside consultants, Authorities and national and supranational government agencies, where required by law or legal process: this includes sharing Personal Information with other parties involved in litigation in which we are or may be involved or with a court of law, if reasonably necessary;
- (x) to the Aioi Nissay Dowa Insurance Company of Europe SE (for Theft, Fire and ancillary coverages) and to Nobis Compagnia di Assicurazioni S.p.A. (for Driver Accident, coverage available only for Vehicles used in the Venice Municipality Service), as well as to Toyota Insurance Management SE for the management of insurance services and claims.

(B) Notwithstanding paragraph (A) above, if you use KINTO Share car sharing services as an employee of a Company or Public Administration, based on specific terms agreed between KINTO and your Company/Public Administration in order to make a vehicle available to you as a "benefit" or "company car", your Personal Data, or only some of it, may be communicated to a designated person ("Admin") of your Company/Public Administration who will have access to a dashboard containing your personal data, contact details and some information about the individual trips you have made (relating, for example, to kilometres, duration, times etc. ). In this way, the Company/Public Administration will be able to monitor and/or verify:

- the correct use of the service;
- the actual availability of vehicles "in real time";
- compliance with any constraints on your use of the service as an employee (e.g. based on internal regulations);
- the possible risk of exceeding the mileage limits provided;
- the responsibilities of any charges, if any, by KINTO for amounts in excess of those agreed upon (e.g., in the event of damages, claims, penalties, etc.).

(C) Without prejudice to what is stated in paragraph (A) above, if you use KINTO Share car sharing services as an employee of a Company or a Public Administration (by way of example but not limited to the Municipality of Venice) that, on the basis of specific conditions agreed upon with KINTO, has a contract with a third-party Company that will directly bear the costs of the service by making the vehicle available to you as a "benefit" or as a "company car", your Personal Data, or only some of it, may be disclosed to a designated person ("Admin") of such third-party Company who will have access to a dashboard containing your personal and contact information and certain information about the individual trips you have made (relating, for example, to mileage, duration, times etc. ) in order to allow the Company/Public Administration of which you are an employee to monitor and/or verify:

- the correct use of the service;
- the actual availability of vehicles "in real time";
- compliance with any constraints on your use of the service as an employee (e.g. based on internal regulations);
- the possible risk of exceeding the mileage limits provided;
- the responsibilities of any charges by KINTO for amounts in excess of those agreed upon (e.g. in the event of damages, claims, penalties, etc.).

The entities listed above may, under certain circumstances, obtain access to your Personal Data as part of the provision of their services and may process such Personal Data either as Data Processors, as independent Data Controllers, or as Joint Data Controllers, as the case may be.

The Data Processing Respondents to whom the Controller delegates further processing operations have been carefully selected in order to ensure the protection of your rights and the protection of your Personal Data.

The full list of the entities to which, for various reasons and for the purposes indicated above, the Controller may communicate your Personal Data, may in any case be requested without formality from KINTO Italia.

Some of the companies to which the Data Controller communicates Personal Data may not be based within the territory of the European Union (EU) or the or European Economic Area - (EEA), and therefore your Personal Data may be transferred to third countries that do not guarantee an adequate level of protection of personal data, such as the United States of America, including by means of their inclusion in databases managed by third party companies, operating on behalf of the Data Controller.

In this regard, the Data Controller ensures that the management and processing of your Personal Data will be bound to the purposes for which it was collected and will take place in strict compliance with the conditions set out in Chapter V of the GDPR in order to ensure an adequate level of protection for natural persons. In particular, the Controller shall take all appropriate and necessary contractual measures to ensure an adequate level of protection of your Personal Data, including - among others - agreements based on the standard contractual clauses for the transfer of data outside the EEA, approved by the European Commission (Art. 46 of the GDPR). We may also disclose your Personal Data whenever it is necessary for us to comply with requests from Judicial or Public Security Authorities. Your Personal Data will not be disclosed under any circumstances.

## **6. 6. How long do we keep your Personal Data?**

We keep your Personal Data for as long as is strictly necessary to fulfil your requests and/or pursue the purposes we have outlined above. We provide a summary table below:

<b>Purpose</b>	<b>Storage time</b>
<i><b>Follow up your request – fulfill a contract (paragraph 3.1)</b></i>	For the duration of the relationship and 10 years thereafter (ordinary statute of limitations).
<i><b>Geolocalization data (paragraph 3.2)</b></i>	Geolocation data (i.e., information collected through devices such as, for example, GPS or black boxes) will be retained for 1 year after collection; except as needed to counteract unlawful acts or handle any claims.
<i><b>Marketing purpose and market surveys (paragraph 3.4)</b></i>	The data will be processed for as long as the user's account is active, without prejudice to the user's ability to revoke the consent given at any time as easily as it was given.
<i><b>Profilation (paragraph 3.5)</b></i>	The data will be processed from the moment the user gives the specific consent requested during registration, until his/her unsubscribe in the appropriate section of the DEM (Direct e-mail Marketing), or until his/her withdrawal of consent in the appropriate section of the App.
<i><b>Soft Spam (paragraph 3.6.)</b></i>	Data will be processed for as long as the user's account is active and for 2 years thereafter

<p><b>Communication to Toyota Group Companies for Marketing Purposes (paragraph 3.7)</b></p>	<p>The data will be processed for as long as the user's account is active, without prejudice to the user's ability to revoke the consent given at any time as easily as it was given.</p>
<p><b>Conduct market surveys in relation to mobility services - "survey purposes" (paragraph 3.8)</b></p>	<p>The data will be processed for as long as the user's account is active, without prejudice to the user's ability to revoke the consent given at any time as easily as it was given.</p>

In addition to the above, the Data Controller guarantees that the Personal Data collected will be processed only for the period necessary to achieve the purposes for which it was originally collected: any further processing or storage of Personal Data will be carried out only as permitted by law.

## **7. What are your rights?**

Applicable law grants you a number of rights including, but not limited to:

- (i) **the right to be informed:** you have the right to receive clear, transparent and easily understandable information about how we use your Personal Data and your rights in relation thereto. This is partly why we are providing you with this information;
- (ii) **the right of access:** you have the right to obtain access to your Personal Data and to know the origin, the purposes and purposes of the processing, the details of the persons to whom the data is disclosed, the data retention period or the criteria for determining it. You may want to access your Personal Data to confirm our use in accordance with applicable data protection laws;
- (iii) **the right to rectification:** you have the right to correct your Personal Data if it is inaccurate or incomplete;
- (iv) **the right to erasure:** this is also known as "the right to be forgotten" and, in simple terms, allows you to request the deletion or removal of your Personal Data where there are no compelling reasons to continue using it. Please note that this is not an absolute right and some exceptions apply;
- (v) **the right to restrict processing:** you have the right to block or prevent further use of your Personal Data. When processing is restricted, we may still store your Personal Data, but our use of your Personal Data will be limited;
- (vi) **The right to data portability:** you have the right to obtain and re-use your Personal Data for your own purposes across different services. For example, if your relationship with KINTO Share ends, this right allows you to easily move, copy or transfer your Personal Data between our IT systems and those of another service provider, without compromising usability. Please note that this is not an absolute right and exceptions apply. In addition, this right may only apply in certain circumstances and on condition that it does not adversely affect the rights of others (for example, it may apply in relation to Personal Data you have provided to us, which we have processed in order to fulfil our contract with you);
- (vii) **the right to object to processing:** where processing is based on our legitimate interest, you have the right to object to such processing unless we have a valid and legitimate reason to continue processing the Personal Data;
- (viii) **the right to object at any time to the processing of Personal Data for direct marketing purposes;**
- (ix) **the right to lodge a complaint:** you have the right to lodge a complaint about the way we handle or process your Personal Data with your national data protection authority;
- (x) **to withdraw your consent at any time,** where this constitutes the legal basis for the processing. Revocation of consent, however, does not affect the lawfulness of the processing based on the consent given before revocation.

All of the aforementioned rights may only be exercised in relation to the Personal Data relating to the use of KINTO Share.

## **8. How can I exercise my privacy rights?**

As indicated in this Privacy Policy, your Personal Data is collected and used by more than one company. To make it as easy as possible for you to exercise your rights, all requests or complaints may be addressed to KINTO Italia S.p.A. for the attention of the DPO appointed by it.

You may therefore exercise the above rights by making a written request to the Data Controller at the contacts indicated in point 1.

We will proceed according to your instructions without delay and, in any case, no later than one month from receipt of your request. In accordance with Article 12 of the GDPR, this period may be extended by two months, if necessary, taking into account the complexity and number of requests we receive. In this case, we will in any case send you, within one month of receiving your request, a communication informing you and giving you the reasons for the extension.

If there is any doubt about your identity, you will be asked to provide proof of your identity, for example to prevent unauthorised access to your Personal Data.

If you request deletion of your Personal Data, it may be necessary to retain some Personal Data if required or permitted by law. Please note that, where the response to your request has not been satisfactory in your opinion, you may address and lodge a complaint with the Personal Data Protection Authority in the manner provided for by the Applicable Law and by following the instructions available on the website: <https://www.garanteprivacy.it>.

## **9. Changes to this Privacy Policy**

This Privacy Policy will be updated periodically: you can check the date of the last update at any time by referring to the date on the first page of this document. Any significant changes will be notified to you through individual communications or directly through the App.

If you have any questions about changes to this Privacy Policy, please contact us as set out in section 8 "How can I exercise my privacy rights?" above.

## **10. 10. Customer form for exercising privacy rights**

**Click below for the form: Customer form for exercising privacy rights (PDF)**