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PRIVACY POLICY

made pursuant to articles 13 and 14 GDPR

With the entry into force of Regulation (EU) 2016/679 "concerning the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data and repealing Directive 95/46 / EC" ("GDPR" or "Regulation"), the societies:

1. Ficuride Srls, with registered office in Ragusa, via Failla n. 39, VAT number 01737470888 (hereinafter "Antudo"), Both in person and in the capacity of representative of Ficuride Srls in the European Union pursuant to art. 27 GDPR,

in their capacity as data controller is required to provide some information regarding the methods and purposes of the processing of personal data.

In particular, Ficuride and Antudo (hereinafter "Co-owners" or "Antudo") Have entered into an agreement with which they have determined in a transparent manner, pursuant to art. 26 GDPR, the respective responsibilities regarding compliance with the obligations deriving from the Regulation. The essential content of the aforementioned agreement can be consulted by sending a request to the e-mail address privacy@antudomobility.com.

Who does this privacy policy apply to and what is its purpose?

This privacy policy ("Disclosure") Applies to the user ("Interested") Of the rental service of innovative electric propulsion vehicles provided by Antudo (the "Service"). Its purpose is to illustrate to the interested party the methods, timing and purposes of processing his personal data. It also specifies what are the rights of the interested party in



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relation to the processing of his personal data and how he can exercise them.

Antudo offers this Service by allowing users to rent an innovative electric vehicle once or more in the specific operating area, through prior registration by downloading the application called "Antudo" (hereinafter "App") On a mobile device, in accordance with the conditions of use available on the App and on the antudomobility.it website. In order to make the Service usable, we need to collect and process certain personal data of the interested party.

Pursuant to art. 4 GDPR, the expression "personal data" means any information concerning an identified or identifiable natural person (hereinafter "Personal data").

This Information is provided solely and exclusively with reference to the App and not for any third party websites or applications through which, for example, the Data Subject should access / or use the App.

What kind of Personal Data do we collect, how and for what purposes?

To provide our Service, we may collect the following Personal Data for the purposes specified below:

- Name and Surname;
- Gender;
- email address;
- Cellphone number;



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- Identity document or driving license;
- Personal photo, possibly uploaded by the user as a "profile photo";
- Information provided to us by third parties (for example Apple, Facebook, Google) by logging in to the Service through these platforms (cd single sign-on, or SSO);
- Payment information;
- Hourly recordings relating to calls to our Customer Service and vehicle pick-up points (including date, time and place);
- Geo-location information;
- IP address and information on the device used and the software (for example: configuration information of mobile devices, Internet browser used, third party applications or platforms used to access our platforms).

Failure to communicate the Personal Data by the Data Subject could lead to limitations in accessing the Service, including assistance, up to the total impossibility of using the Service.

In order to carry out surveys on the quality of our Service, we may process additional Personal Data provided by the Data Subject such as age (indicated by age group), gender, profession, city of residence and gross annual income.

By virtue of agreements with our business partners, we may also process any personal data of an associative nature made by the interested party to take advantage of specific promotions or offers.

What are the purposes and legal bases of the processing?



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Personal Data will be processed to guarantee the Data Subject the full usability of all the features of the Service offered by Antudo and, in particular:

1. for the registration of the interested party to the Service and for its use;
2. for the management of payments related to the use of the Service;
3. to verify the correct use of the Service;
4. to keep the interested party updated on the activities carried out by him in relation to the Service;
5. to answer the questions of the interested party, to provide him with all the necessary assistance (for example: support in the recovery of lost or stolen vehicles, assistance in the event of accidents or setbacks, etc.) and for the activities of troubleshooting;
6. to keep the Data Subject updated on new features and improvements of the Service, as well as on new offers and promotions available;
7. to allow the exercise of our right of defense in the appropriate places.

The legal basis of the treatments listed above by numbers 1 to 5 is the fulfillment of the contractual and / or legal obligations to which the Joint Controllers are required in order to provide the Service correctly.

The legal basis of the treatments listed above at numbers 6 and 7 is recognized in the legitimate interest of the Joint Controllers, respectively, to keep the interested party updated on the new features of the Service and promotions, as well as to allow us to adequately protect our right of defense in the appropriate locations.

In relation to the purpose referred to in point number 6, the interested party may oppose the processing at any time, managing their notification preferences in the dedicated section in their



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personal area of the App, or, for communications via e-mail. , following the procedure of unsubscribe in the same specified. It is in any case possible to exercise their rights as indicated in paragraph "Rights of the interested party".

In relation to the purpose referred to in point number 7, the interested party may object to the processing at any time and exercise their rights as indicated in the paragraph "Rights of the interested party".

Processing methods

The Personal Data of the interested party will be processed by Antudo in compliance with the principles of the Regulation and the applicable privacy legislation, which provide, among other things, that the data itself is:

- processed lawfully and fairly;
- collected and recorded for specific, explicit and legitimate purposes;
- accurate and up-to-date;
- relevant, complete and not excessive in relation to the purposes of the processing.

The processing of Personal Data will take place using suitable tools to guarantee its security and confidentiality and may be carried out, as well as with manual tools, also through automated tools (both IT and telematic) designed to store, manage and transmit the data.

Automated decision-making processes

Some processing of Personal Data may give rise to automated decision-making processes, necessary to prevent fraud or activities that may otherwise damage Antudo. In some cases, for example, if a payment is not successful, the Data Subject could be prevented from



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using the Service until the problem is resolved and / or the balance of the amount due has been made.

In such cases, the interested party always has the right to obtain the intervention of our Customer Service, which can be contacted at the address support@antudomobility.com.

Retention period of Personal Data

We will keep the Personal Data of the interested party for the time necessary to fulfill the purposes indicated in the previous paragraph "What are the purposes and legal bases of the processing?" And, in any case, in compliance with the retention times for Personal Data applicable by law.

Communication of Personal Data to third parties

The aforementioned processing of Personal Data connected and / or instrumental to the provision of the Service may provide for the communication of the aforementioned data to the following categories of recipients, who will process them, as appropriate, in their capacity as data controllers or data processors:

- Companies belonging to the group of Joint Controllers;
- Companies, entities or consortia that provide Antudo with payment services, processing services, IT services, or other types of activities instrumental to the provision of the Service;
- Business partners;
- Public Administrations or Local Authorities;
- Professionals and firms that Antudo uses (lawyers, accountants, etc.).



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In any case, in the event of corporate mergers, reorganisations, acquisitions, joint venture, etc., the personal data of the interested party could be transferred to any third parties affected by the aforementioned operations.

Furthermore, we may have to disclose the Personal Data of the Data Subject based on the requirements of laws, disputes, legal proceedings and / or requests made by law enforcement agencies, public or government authorities, for security purposes or for other relevant circumstances. public. When legally possible, we will take care to inform the interested party before such communication.

We may also disclose the Data Subject's Personal Data to third parties if such disclosure is reasonably necessary to protect our rights and use available remedies, enforce our terms and conditions, investigate fraud or protect our activities, our Service and / or our customers.

Transfers of Personal Data

Due to the organizational structure of Antudo and in order to guarantee the best service to the interested party, we may transfer the Personal Data to companies of the group of Joint Controllers located outside the European Union or the European Economic Area. In this case, the transfer will be subject to adequate security and data protection guarantees and will take place on the basis of standard contractual clauses negotiated with the company located in the third country, where the latter is not the recipient of an adequacy decision pursuant to art. 45 GDPR.

Rights of the interested party

The interested party may exercise the following rights at any time:



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- access to Personal Data, requesting that they be made available to you in an intelligible form (formerart. 15 GDPR);
- to obtain the rectification (formerart. 16 GDPR) or the cancellation (pursuant to art.17 GDPR) of the same, or the limitation of processing (formerart. 18 GDPR);
- to obtain the portability of Personal Data (formerart. 20 GDPR);
- to oppose the processing of Personal Data (formerart. 21 GDPR);
- to lodge a complaint with the competent Supervisory Authority (formerart. 77 GDPR).

The interested party may contact Antudo regarding the exercise of their rights and for any comments, complaints, requests or questions on the content of this Notice at the e-mail address privacya@antudomobility.com.

In any case, the limitations on the exercise of the aforementioned rights provided for by art. 23 GDPR and the applicable national legislation on the protection of personal data.

Update of the information

The Joint Controllers may periodically update the Information in the light of regulatory changes or legislative changes. If significant changes are made, we will communicate these changes to the Data Subject through the App or by other means, for example by e-mail.

We invite all users to periodically consult this Policy to keep up to date on our commitment to better protect their privacy.