

Personal data processing policy under the terms of art. 13 of Regulation (EU) 2016/679

In compliance with European legislation on the processing of personal data, below are the details as required by article 13 of EU Regulation 2016/679.

The Data Controller is the company Askoll EVA - Electric Vehicle Askoll - Via Industria, 30 36031 Dueville Vicenza, Italy - Tel. (+39) 0444 920260 - email askoll@askoll.com.

Purposes and legal basis for processing: a) to allow, via use of the app, us to guarantee constant checks on the operation of the vehicle to which it is connected via Bluetooth, noting that the term “checks” should be understood as monitoring of vehicle operation; this processing is based on fulfilment of contractual obligations upon the data controller following the user's decision to use the app; b) to allow the user to use the app to manage photographs taken by them during use of the app; this processing is based on the consent of the data subject, that is provided via connection of the app to photography functionality on the smartphone where the app is installed; this functionality is additional and optional and if it is not activated, this will not compromise the functionality detailed under letter a); c) to allow journeys made by the vehicle to be recorded via connection of the app to the geolocation system on the smartphone where the app is installed; this functionality is additional and optional and if it is not activated, this will not compromise the functionality detailed under letter a); d) to allow the data controller, where the user wishes, to send them the newsletter and other marketing messages using the email address provided during activation of the app; this processing is additional and optional and if it is not activated, this will not compromise the functionality detailed under letter a). Using app functions, the user has the option to amend their choices regarding the processing described under points c) and d) at any time; it is also noted that the smartphone functions allow the user to manage connections between the app and various elements of smartphone functionality.

Data recipients: the data subject to processing will not be disclosed or distributed to third parties. It is noted that parties located in the European Union and appointed as Data Processors may have access to the data, for management of data archiving data and maintenance of IT systems used for processing. It is noted that no party has access to data generated by use of the app (vehicle operation, photographs, routes driven) unless this is strictly necessary for performance of system maintenance activity.

Data storage period: the data will be stored for the entire period of usage of the app or until a request for deletion of data is received from the user. In this regard, it is noted that: a) the user, via app functions, has the option to request deletion of records of routes driven for a period of time specified by the user; b) when the user deletes the app from their device, on the basis of the backup

methods used (more information), the relative data are completely deleted within a month of this date. In this regard, it is noted that there is no functionality available allowing indication of deletion of the app, therefore allowing its early deletion. Therefore, the process for deletion of data stored in remote processing systems is performed via the following procedure:

1. Following 12 months of inactivity by the user (the user has not logged in to the app), an email will be sent, notifying that to keep the user profile and relative data active at least one login must be performed within a month.
2. Following another 15 days, another email will be sent and at the end of the month a final email will be sent communicating definitive deletion of data.
3. Following deletion and removal of the relative backups, it will no longer be possible to recover the data.

c) in order to guarantee service continuity, the data for which deletion has been requested or performed remain stored in the system “backup” archives and are not subject to any other form of processing.

Right to access, rectification and deletion: all data gathered and processed can be accessed directly by the user via app functions. The user may amend personal details and may, as detailed above, request deletion of routes driven. The data provided by the user are not amended and additional data managed by the app is gathered via automatic systems and is therefore accurate, except in the case of a fault. In addition to this, rights may be exercised by submitting a request to the Data Controller via one of the contacts indicated above.

Right to lodge a complaint: it is noted that, if it is believed that processing of personal data has been performed via methods which are not compliant with applicable legislation, a supervisory authority may be contacted, represented in Italy by the Personal Data Protection Authority (Garante per la protezione dei dati personali).