



Information on the processing of Personal Data 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 Flex and/or KINTO Share, wishes to inform you that the correct management of your Personal Data (as identified in point 2 below) and the trust you place in KINTO products and services are our priority: with this in mind, we will collect, use, transfer and store information relating to you or referable to you ("Personal Data").

Receiving information, in a transparent manner, about how we process and protect your Personal Data is your right. Therefore, please take a few minutes to read this privacy policy ("Policy").

The Information is provided pursuant to Legislative Decree No. 196 of 30 June 2003 ("Privacy Code"), EU Regulation No. 679/2016 ("GDPR") and subsequent national adaptation regulations (jointly "Applicable Legislation"), and relates exclusively to personal data collected to access and benefit from:

- KINTO Flex vehicle rental service (hereinafter 'KINTO Flex') provided through the use of the web platform accessible at <https://flex.kinto-mobility.it/> (hereinafter referred to as the "Web Portal"); and/or
- KINTO Share car sharing service (hereinafter referred to as "KINTO Share") provided through the use of the mobile application of the same name (hereinafter referred to as the "App"), or the web portal of the same name (hereinafter referred to as the "Web Portal" or "Web") accessible from <https://www.kinto-share.it/>.

1. Who are you giving your data to? Who will process them?

The company KINTO Italia S.p.A. (hereinafter "KINTO Italia" or the "Data Controller") is the Data Controller, i.e. the entity that defines the ways and means by which your

KINTO Italia S.p.A.

Via Kiiciro Toyoda, 2, 00148, Rome (RM)

Share Capital € 39,000,000.00 i.v. - Company Register of Rome - ISO 14001:2015 certified Tax

Code and VAT No. IT15354911008 - Rome R.E.A. No. 1584815

Single-member company - Management and Coordination of KINTO Europe GmbH

PEC: kintoitalia@legalmail.it |

Email: info@kinto-mobility.it |

Website: kinto-mobility.it

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 numbers:

- Telephone: +39 06/548981
- E-mail: info.flex@kinto-mobility.it (KINTO Flex); info.share@kinto-mobility.it (KINTO Share)
- PEC: 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 relating to the processing of your Personal Data at the following e-mail address: dpo@kinto-mobility.it.

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

To enable the registration and use of KINTO Flex and/or 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 are listed below and may be entered in the manner specified:

- Contact data: e-mail address and mobile phone number to be entered manually.
- Facial image (to be compared with those on the documents below): the user's image will be captured during registration by the user with the device (selfie).
- Data relating to an identification document (Electronic Identity Card or Electronic Passport): the document must be photographed and the system will acquire from it by automatic reading, when possible, the number, expiry date and country of issue, in addition to the personal data available on the document itself from among those listed below. In the case of a different document – e.g. paper identity card – the data will have to be entered manually (it will still be necessary to photograph the document).
- Driving licence data (in card format, category B or equivalent): the document must be photographed, and the system will acquire from it by automatic reading, when possible, the identification number, expiry date, country of issue and the personal data available on the document from among those listed below. In the case of a different document – e.g., European driving licence in paper format (or non-European driving licence with sworn translation, or international driving permit) – the data will have to be entered manually (it will still be necessary to photograph the document).
- Biographical data: if information on first name, surname, date of birth, gender,

address, postcode, and country of residence cannot be acquired automatically from the documents, it must be entered manually.

- Tax code: this information is read from the electronic identity card, if possible. Alternatively, it must be entered by manual typing or by means of a special Web Portal calculation function, which allows the code to be calculated using the information required for this purpose and already requested from the user.
- Payment data (payment method; transactions carried out): it will be necessary to enter details of a valid card (or other payment method).
- Data relating to the vehicle and its use: kilometres driven and data relating to the location of the vehicle (so-called 'geolocation data').
- Data relating to your professional activity, if any (Professional title; VAT number; PEC address; SDI code): this information will be further requested from you and must only be provided if you choose to register by creating a professional account (reserved for freelancers, companies, and their employees).
- Exclusively for KINTO Flex, data relating to the customer's creditworthiness and solvency (by way of example but not limited to, in the case of an employee: last two pay slips; in the case of a pensioner: last payslip or for italian customers CUD, or "modello unico" form or 730; in the case of a self-employed person: for italian customers "modello unico" form and receipt of telematic submission to the tax authorities).

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

3.1 Follow up on your requests for registration and use of the KINTO Flex Service and/or the KINTO Share Service and manage the resulting contractual relationship.

We will process your Personal Data for:

- allow registration for services and the creation of an account via the Web Portal and/or the App;
- authenticate the user by comparing the uploaded image and verifying the validity of the documents provided to create the account and access the service (such as an identity document, social security number and driving licence), also to prevent fraud and identity theft.
- monitor the validity of the information and keep the images, data and identification numbers of these documents for possible requests by the Authority and/or other legal obligations;
- manage your booking requests via the Web Portal (and/or App), tracking your booking history, selected vehicles and rental duration (and/or service usage);

- allow you to reserve KINTO Flex vehicles, following fraud and solvency checks, and manage their pick-up and drop-off; and/or allow you to use KINTO Share service vehicles in car sharing and manage your account via App or Web Portal;
- manage your account and respond to any support requests and/or complaints to our customer service;
- update you on changes to the KINTO Flex and/or KINTO Share Terms and Conditions and this Privacy Policy;
- update you on your use of KINTO Flex and/or KINTO Share by, for example, e-mail notification of bookings made and/or rentals concluded;
- manage the debits and payments of the KINTO Flex and/or KINTO Share service and the related billing activity, including the recovery of any outstanding amounts, also with regard to the payment of costs related to excess mileage;
- prevent, on the basis of total mileage data, situations in which you may not be guaranteed the services and benefits provided for in the contract (e.g. we may contact you if you are about to exceed the maximum mileage limits, or to ensure the routine maintenance of the vehicle in order to maintain its safety conditions, on the basis of the contract);

For the achievement of the aforementioned purposes, the legal basis pursuant to Art. 6(1)(b) of the GDPR consists of the need to carry out pre-contractual and contractual activities for the purpose of providing the services associated with the use of KINTO Flex and/or KINTO Share, as described in the Terms and Conditions of Service (available on the Web Portal and/or App).

Regarding the cases listed above, failure to provide your Personal Data will make it impossible to create an account, verify it and proceed with the proper provision of services.

It will always be ensured by the Holder that the account can be deleted as stated in the KINTO Flex and/or KINTO Share Terms and Conditions. In the event of an account deletion request, the Owner will delete the Personal Data that is no longer required within 30 days. In the event that the data is not completely deleted because it is needed for legally permitted purposes, its processing will still be restricted.

3.2 Fulfilling legal obligations

We will process your Personal Data, in accordance with Article 6(1)(c) of the GDPR, to manage relations with third-party authorities and public bodies for purposes related to particular requests, the 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.).

3.3 Let you know about our best offers and/or services in a timely manner ('marketing purposes').

Subject to your specific consent, we will process your Personal Data to send you commercial offers relating to KINTO Flex and/or KINTO Share and the Controller's other products and services, in order to constantly update you on KINTO brand products and services and to improve their quality.

The Personal Data you provide will be used to contact you through various automated means, such as e-mail or SMS and/or push and in-App notifications. 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 e-mail to the contact details of the Controller, specified in the "Contacts" 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 via the Web Portal / App or by writing to support.flex@kinto-mobility.it or support.share@kinto-mobility.it, depending on the service you use.

3.4 Process your personal data and consumption habits in order to propose to you the best commercial offers in line with your personal needs ('profiling purposes').

Subject to your specific consent, we will process your Personal Data to analyse your preferences, habits and activities on the Web Portal and/or in the App, in order to send you personalised communications in line with your tastes and increasingly responsive to your interests and needs (i.e. profiling), to guide you in your customer journey and to provide you with commercial offers on KINTO 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 Web Portal / App or by writing to support.flex@kinto-mobility.it or support.share@kinto-mobility.it, depending on the service you use.

3.5 Soft Spam

We will send you, exclusively via the e-mail address you have provided, commercial information relating to new services and/or functions of KINTO Flex and/or KINTO Share that are similar to 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 take place by e-mail, and recognises that you have the possibility of deciding to stop receiving such communications at any time and of notifying the Controller's contacts, listed in paragraph 1 of this Policy, by written request. In this 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 Controller; the protection of this legitimate interest would not be possible without using your Personal Data.

3.6 Communication to Toyota Group Companies for Marketing Purposes

Only with your specific consent, the Personal Data you provide will be communicated to companies of the Toyota Group (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 on 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 specifically collected, and can be revoked via the Web Portal / App or by writing to support.flex@kinto-mobility.it or support.share@kinto-mobility.it, depending on the service you use.

3.7 Conducting 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 carry out surveys and market research in connection with mobility services such as, for example, long and medium-term rentals, car sharing, carpooling, parking payment apps, and the purchase of tickets for multiple modes of transport.

The legal basis for the processing is, according to Art. 6(1)(a) of the GDPR, your specific consent, which will be specifically collected, and can be revoked via the Web Portal / App or by writing to support.flex@kinto-mobility.it or support.share@kinto-mobility.it, depending on the service you use.

3.8 Carrying out 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 the data relating to your account, your rentals and the history of your use of the KINTO Flex service to

- verify, also by means of surveys, the quality of the service provided to you and your degree of satisfaction.
- improve the performance of Toyota and Lexus vehicles, software (e.g. the Web

- Portal), existing products and services or develop new ones;
- Carry out research, development, data analysis and profiling of user groups to improve KINTO Flex and develop new mobility services and solutions;
 - protect, maintain and support our networks, systems and applications.

The above data will be processed exclusively in anonymous and/or aggregate form and, solely for internal administrative statistical purposes, may be communicated to other Toyota Group companies.

For the achievement of the above purposes, the legal basis, pursuant to Article 6(1)(f) of the GDPR, is the existence of and the need to protect a legitimate interest of the Data Controller; the protection of such legitimate interest would not be possible without the use of your Personal Data.

3.9 Geolocation

Exclusively for KINTO Flex:

The Controller may process data relating to the position of the vehicle(s) in order to locate the vehicle(s) in the cases and within the limits described below. Access to this data by the Controller will not take place on a continuous basis, but only on demand. Acquisition of vehicle location information by the Controller will only take place in cases of: insolvency, serious and proven suspicion of theft or fraud, request by local/national authorities or by interested parties.

For these purposes, the processing of geolocation data will be carried out in accordance with Article 6(1)(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 Flex.

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 Article 6(1)(c) of the GDPR in order to comply with and/or execute a legal obligation as further specified in Section 3.2.

Exclusively for KINTO Share:

In order to provide carsharing services correctly and to locate the vehicle used in the event of any unlawful acts or accidents, the Holder will use geolocalisation data relating to the position of vehicles.

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

Information on the pick-up and delivery location of vehicles used for KINTO Share carsharing will be accessible to the Holder and the following parties:

- Data Processor specifically appointed by the Data Controller: this person may access the data collected from the vehicle in the event of an accident or emergency. In such cases, in fact, the geolocation system on the vehicle is queried by acquiring its position.
- Data Controller: the acquisition of vehicle location information by the Data Controller is only carried out 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 will be able to retrieve the last position of the vehicle at the customer's request or in the event of suspected theft of the car: since the GPS position is transmitted by 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 entail 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 aforementioned purposes, geolocation data will be processed in the event of specific requests from users, pursuant to Article 6(1)(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 Article 6(1)(c) of the GDPR in order to comply with and/or execute a legal obligation as further specified in point 3.3 below.

4 How do we process your Personal Data? Who do we use to do so?

(A) We shall process your Personal Data by manual, computerised or telematic means, and in all cases in such a way as to guarantee their security and confidentiality.

When registering to the Web Portal and/or App, the Personal Data required can be entered manually or, alternatively, through Optical Character Recognition ("OCR") technology. This system processes the images of the documents you have photographed or scanned (e.g. Electronic Identity Card, European Driving Licence in card format) in order to extract the information contained therein and automatically insert it into the personal data fields provided on the App or Web Portal.

In addition, the system will compare the photo of your face with the one on your uploaded documents in order to confirm your identity and proceed with registration. Regardless of the way 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 if it is incorrect or out of date, via App, Web Portal or by contacting customer support. After images have been captured, they 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 relating 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 we have duly instructed and trained or, in the case of external providers, appropriately 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 a connectivity device is installed in the vehicle that shares the following data with KINTO Italia:

- information on kilometres travelled, in order to charge and invoice monthly for any excess kilometres.
- geolocation of the vehicle, only at the request of KINTO Italia and in the event of default. The location of the vehicle will be shared via a special computer system, not continuously.

The sharing of the above information ("Connected Services") is made possible by a special agreement between KINTO Italia and Toyota Motor Europe NV/SA ("TME"). The data relating to your individual rental will be processed by TME as data controller. In addition, this equipment allows you to contact help quickly via a special 'SOS' button located in the vehicle's interior.

Exclusively for KINTO Share, we also inform you that a telemetry apparatus will be installed on the vehicle that acquires information on the position of the vehicle and on driving conditions such as, for example, acceleration and braking. This information is collected and processed by means of the aforementioned apparatus in order to allow the Controller to provide for the correct management of the vehicle and the provision of certain additional services (such as, for example, roadside assistance).

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 specific agreements, will be shared with the operators of the official Toyota, Lexus and KINTO network (e.g. Dealers), appointed by the Controller as the Data Processors of your Personal Data. Carefully selected service providers, including those managing the platform through which the KINTO Flex and KINTO Share services are provided, as well as those managing the electronic payment system for rentals (and, exclusively for KINTO Flex, those managing the customer verification systems for anti-fraud and solvency purposes), were also entrusted with this task.

All such entities will, where necessary to fulfil your requests or for the other purposes

described herein, access and process your Personal Data, within the limits described in the relevant deeds of appointment.

The full list of the persons to whom, for various reasons and for the purposes indicated above, the Data Controller communicates your Personal Data may in any case be requested without formalities through the contact details indicated in section 1.

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

- (i) to third parties that provide services relating to the Controller's business in connection with KINTO Flex and/or KINTO Share, and with which specific agreements have been signed in accordance with the Applicable Regulations. These are first and foremost the French company Vulog SA - which provides the management platform for the KINTO Flex and KINTO Share services and performs all the activities necessary for the management of the KINTO Flex and/or KINTO Share platform and database (whose servers are based in Germany), as well as the resolution of problems 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 authorised Toyota, Lexus and KINTO network Dealers and Service Centres that provide KINTO Flex service vehicles or perform maintenance and servicing on such vehicles;
- (iii) the companies that maintain and manage the electronic payment system through which the amounts due by customers for using the service are paid;
- (iv) to suppliers who handle administrative sanctions related to the circulation of vehicles;
- (v) to suppliers, and to Toyota Group companies, carrying out customer verification for anti-fraud and solvency purposes (exclusively for KINTO Flex);
- (vi) to suppliers, and to Toyota Group companies, which take care of the recovery of any claims against customers;
- (vii) any companies operating the KINTO Flex and/or KINTO Share customer service and the breakdown service;
- (viii) to other companies in the Toyota Group - specifically, Toyota Motor Europe NV/SA (TME), Toyota Motor Italia S.p.A. (TMI), Toyota Financial Services Italia S.p.A., Toyota Insurance Management SE, Aioi Nissay Dowa Insurance Company of Europe SE, for accounting needs, to manage payment for KINTO Flex services and/or to comply with sector regulations; Toyota Sweden AB, for needs to access CRM (Customer Relationship Management) systems.
- (ix) to external consultants, authorities and national and supranational public bodies, where required by law or legal process: this includes sharing Personal Data with other parties involved in litigation in which we are or may be involved or with a court of law, where reasonably necessary.

- (x) to Aioi Nissay Dowa Insurance Company of Europe SE, and to Toyota Insurance Management SE for the management of insurance services and claims.
- (xi) to mobile network operators that support the on-board navigation system necessary for KINTO Share to function effectively: in order for mobile network operators to comply with their legal obligations, which require them to obtain certain identifying information about the user, we will collect such identifying information and provide it to the mobile network operator (exclusively for KINTO Share);
- (xii) to the Insurance Company Nobis Compagnia di Assicurazioni S.p.A., for Driver Accident, coverage available only for Vehicles used in the Service of the Municipality of Venice (exclusively for KINTO Share).

The entities listed above may, in 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 autonomous Data Controllers, or as Joint Data Controllers, as the case may be.

The Processors 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 subjects to whom, for various reasons and for the purposes indicated above, the Controller may communicate your Personal Data may in any case be requested without formalities from KINTO Italia.

Some of the companies to which the Controller discloses Personal Data may not be established within the territory of the European Union (EU) or the 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 the inclusion of your Personal Data in databases managed by third party companies, acting on behalf of the Controller.

In this respect, the Controller ensures that the management and processing of your Personal Data will be bound to the purposes for which it was collected and will be carried out 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 we need to do so in order to comply with requests from law enforcement or public security authorities. Your Personal Data will not be disclosed under any circumstances.

(B) Exclusively for KINTO Share, without prejudice to what is indicated in paragraph (A) above, if you use KINTO Share car sharing services as an employee of a Company

or Public Administration, on the basis of specific conditions 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 person in charge ("Admin") of your Company/Public Administration who will have access to a dashboard containing your personal and contact details and some information on the individual journeys 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 restrictions on your use of the service as an employee (e.g. according to internal rules);
- the possible risk of exceeding the maximum mileage limits;
- liability for any charges by KINTO for amounts in excess of those agreed (e.g. in the event of damage, claims, penalties, etc.).

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.

Below is a summary table:

Purpose	Storage times
Manage Account and follow up on your request – execution of a contract (point 3.1)	For the entire duration of the relationship and thereafter – for 10 years (ordinary limitation period).
Account deletion (point 3.1)	The data will be deleted within 30 days of the request. Data that are no longer needed will in any case be processed on a limited basis.

Marketing purposes (point 3.3)	The data will be processed for as long as the user's account is active, without prejudice to the possibility for the user to revoke the consent given at any time with the same ease with which it was given.
Profiling purposes (point 3.4)	The data will be processed for as long as the user's account is active, without prejudice to the possibility for the user to revoke the consent given at any time with the same ease with which it was given.
Soft Spam (point 3.5)	The data will be processed for as long as the user's account is active and thereafter for 2 years.
Communication to Toyota Group Companies for Marketing Purposes (point 3.6)	The data will be processed for as long as the user's account is active, without prejudice to the possibility for the user to revoke the consent given at any time with the same ease with which it was given.
Conducting market surveys in relation to mobility services – 'survey purposes' (point 3.7)	The data will be processed for as long as the user's account is active, without prejudice to the possibility for the user to revoke the consent given at any time with the same ease with which it was given.
Geolocalisation (point 3.9)	Geolocalisation data (i.e. information collected via devices such as GPS or black boxes) will be retained for 1 year after collection; except for the need to combat unlawful acts or deal with claims.

In addition to the above, the Data Controller guarantees that the Personal Data collected will only be processed for the period necessary to achieve the purposes for which it was originally collected: any further processing or storage of Personal Data will only be carried out 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 receive information:** you have the right to receive clear, transparent and easily understandable information about how we use your Personal Data and your rights in this respect. This is partly why we are providing you with this notice.
- (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 data of the persons to whom it is communicated, the period of data retention 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 they are 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 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 Flex or 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. Furthermore, this right may only apply in certain circumstances and provided that it does not adversely affect the rights of others (for example, it may apply in relation to Personal Data that 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) **the right to revoke 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 connection with Personal Data relating to the use of KINTO Flex and/or 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 enquiries or complaints can be addressed to KINTO Italia S.p.A. for the attention of the DPO appointed by it.

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

We will proceed according to your instructions without delay and, at the latest, within one month of receiving 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 that event, 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 instance to prevent unauthorised access to your Personal Data.

In case you request deletion of your Personal Data, it may be necessary to retain some Personal Data, if required or authorised by law.

We remind you that, where the response to your request has not been satisfactory in your view, you may address and lodge a complaint with the Italian Data Protection Authority in the manner provided for by the Applicable Legislation and by following the instructions available on the website: <https://www.garanteprivacy.it>.

9 Changes to this Privacy Policy

This Privacy Policy will be periodically updated: 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 changes will be notified to you by means of individual communications or, alternatively, by simple posting on the Web Portal and/or App of the updated document.

If you have any questions regarding changes to this Privacy Policy, please contact us at the contact details given in Section 1 of this document.