

INTERESTED PARTIES / END CUSTOMERS POLICY FOR THE META TRAK SERVICE PURSUANT TO EU REG. NO. 2016/679 ("GDPR")

IDENTITY AND THE CONTACT DETAILS OF THE CONTROLLER

QTE S.r.l. located in via Meuccio Ruini 10, 42124 Reggio Emilia, tax code and VAT number 02650440353 (hereafter "QTE")

CONTACT DETAILS OF THE DATA PROTECTION OFFICER

Communications with the DPO are confidential and must be addressed to:
dpo@qtelematics.eu, or to QTE S.r.l., via Meuccio Ruini 10, 42124 Reggio Emilia, at
support@qtelematics.eu c.a. DPO

TYPES OF DATA, PURPOSE OF THE PROCESSING

Types of data processed:

- identification data: name, surname, tax code, etc.
- contact details: telephone number, e-mail, address, etc.
- bank details: IBAN, credit card number, etc.
- other personal data: Vehicle plate
- geolocation data: data relating to the location and location of the vehicle

For the following purposes:

- a) Establishment, execution of the contract for the chosen service and sending e-mail of commercial communications in the context of the contractual relationship (known as "soft-spam")
- b) Fulfil obligations under applicable regulations and legislation
- c) If necessary, to ascertain, exercise or defend the rights of the owner in court or out of court
- d) Marketing: e.g. SMS and e-mails, telephone calls with operator and traditional mail for promotional and commercial proposals relating to services / products offered by the Company or reporting of corporate events, as well as carrying out market studies and statistical analyzes, also through the reference dealer

LEGAL BASIS AND PROCESSING METHODS

The legal bases of the applicable processing identified by the GDPR are:

- Execution of a contract to which you are a part (eg provision of the service, communication of access credentials)
- Need to fulfil legal obligations
- Legitimate interests pursued by the controller or by a third party for easier management of the work activity (eg communication with the customer through contact details for information on the status of the service, imminent expiry of the contract, management of the service in general)
- Optional and revocable consent at any time without prejudice to you also in relation to the treatments based on the consent given before the revocation

DATA RETENTION OR THE CRITERIA FOLLOWED TO ESTABLISH SUCH PERIOD The data retention period is:

- 10 years after the termination of the contract for administrative and accounting data in compliance with the legal obligation that requires retention
- the number of months established in the contract with the Customer for geolocation data, and for a further 30 days after the conclusion of the contract
- In the event of a dispute for the duration of the dispute and for the terms of appeal
- For marketing purposes: until recession by the subscriber

Once the aforementioned storage terms have elapsed, the data will be destroyed, deleted or made anonymous, compatibly with the state of the art and implementation costs.

OBLIGATION TO PROVIDE DATA

The provision of data for the purposes referred to in letters a), b) and c) above are mandatory. In case of failure to provide data, it will not be possible to proceed with the contractual relationship.

THIRD PARTIES ADDRESSED TO THE DATA

The data can be transmitted to subjects other than the Data Controller, also autonomous Data Controllers.

The data can also be transmitted to subjects who process them on behalf of the Data Controller as Data Processors on the basis of a legally binding agreement to protect data protection.

Categories of subjects, e.g.

- a) IT providers (e.g. data back-up services, e-mail, WEB / cloud computing, hosting, network monitoring, e-mail sending, website maintenance, etc.)
- b) consultants (e.g. payroll, competent doctor, workplace safety, professionals, etc.)
- c) supervisory and control authorities, public or private subjects who have the right to request data

TSP / DEALER with which the Customer of the META TRAK service signs the contract for the service is a data processor.

SUBJECTS AUTHORIZED TO PROCESSING DATA

The data may be processed by workers in relation to their job, expressly authorized and adequately instructed in the processing.

TRANSFER OF DATA TO THIRD COUNTRIES (EXTRA EU / EEA)

Personal data will be processed on servers located within the European Union.

In any case, it is understood that the Data Controller, if necessary, will have the right to transfer these data abroad to non-European countries.

In this case, the Data Controller ensures as of now that the transfer of non-EU data will take place in accordance with the applicable legal provisions.

Specifically, the data will be transferred abroad to non-European countries, only if the level of data protection of the Third Country has been deemed adequate by the European Commission pursuant to art. 45 of the GDPR or after the adoption of adequate guarantees pursuant to art. 46, 2, lett. c) and d) GDPR (binding corporate clauses, standard contractual clauses, code of conduct, certification mechanism).

In the absence of an adequacy decision, the transfer of data can be carried out in the presence of one of the derogations provided for by art. 49 of the GDPR (e.g. consent, transfer necessary for contractual or pre-contractual purposes in relation to a contract entered into with the interested party or in his favor, ascertainment, exercise or defense of a right in court, etc.).

DATA SUBJECT'S RIGHTS AND COMPLAINTS TO THE SUPERVISORY AUTHORITY

Data subjects have the following rights:

- a. access, for:

- knowing if a data processing is in progress, for what purposes, on which data, recipients or categories of recipients to whom the personal data have been or will be communicated, when possible, the retention period of the personal data provided or, if it is not possible, the criteria used to determine this period, what the rights of the interested party are, information on their origin, if an automated decision-making process is in progress, including profiling (at least in such cases with significant information on the logic used, importance and consequences of this process), what are the appropriate guarantees if the data is transferred to a third country
 - obtain a copy of the personal data being processed without affecting the rights and freedoms of others
- b. correction of incorrect data and integration taking into account the purposes of the processing,
 - c. cancellation in the following cases: a) personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed; b) the interested party revokes consent if there is no other legal basis for the processing; c) the interested party opposes the processing in the absence of prevailing contrary rights or obligations; d) personal data have been unlawfully processed; e) there is a legal obligation in this sense for the Data Controller f) personal data have been collected in relation to the offer of services on the internet
 - d. limitation to the processing for disputing the accuracy of the data, for illegal because excessive treatment, for the assessment, exercise or defense of a right in court (even if the Controller no longer needs the data), in the event of opposition (pending verification of the existence of this right in practice)
 - e. opposition (in the case of processing necessary for the execution of a public interest task or for the legitimate interest of the Data Controller, including profiling) for reasons related to the particular situation of the interested party, except for the prevalence of other public interest rights or obligations of law
 - f. opposition to the receipt of commercial communications with automated methods (e-mail, etc.) for treatment for direct marketing purposes, including profiling
 - g. portability of data in common and interoperable electronic format, also directly to another Operator if technically possible, in case of treatment with automated tools

In the cases referred to the letters b), c) and d), the data controller informs each of the recipients which personal data have been transmitted of any corrections or cancellations or the processing of changes unless this proves impossible or involves a disproportionate effort.

For the exercise of his rights, the interested party can contact the Data Controller through the contacts indicated in this statement.

Data subjects have the right to lodge a complaint with the Competent Control Authority in the Member State in which they habitually reside or managed or in the State in which the alleged regulation is verified.

SOURCE FROM WHICH THE PERSONAL DATA ORIGINATE

Personal data are collected from the interested party by the TSP / DEALER / INSTALLER and entered on the META TRAK portal.

GEOLOCALIZATION DATA

The processing of these Data is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

HAVING READ THE POLICY

I declare that I have received and read the Privacy Policy.

PROVISION OF CONSENT OF THE AFFECTED PARTY

Having read the above Privacy Policy, aware that my consent is purely optional, as well as revocable at any time, I consent to the processing of my data by the Data Controller for the marketing purposes indicated above: sending commercial / promotional communications, through automated contact methods (such as SMS or MMS) and traditional (e.g. phone calls with operator and traditional mail) on their products and services, reporting of corporate events, detection of the degree of customer satisfaction, as well as implementation of market research and statistical analysis.

LAST UPDATED: MAY 2023