

# ATVO S.P.A. PRIVACY POLICY

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## Company Information

Company Name: ATVO S.p.A.

Registered office address: Piazza IV Novembre, 8 - 30027 San Dona' di Piave (VE)

VAT Number: 00764110276

Fiscal Code: 84002020273

## Privacy Policy

The present policy has been compiled to make known the principles of confidentiality that govern the use by ATVO S.P.A. of personal data provided by clients, users, suppliers and other people, including the data collected through this website. This document will describe the management arrangements for processing of personal data of users who visit this Website. This is a notice made also pursuant to the Art. 13 of the EU Regulation 679/2016, and subsequent amendments, for those users who interact with the web services, accessible electronically starting from the address [www.atvo.it](http://www.atvo.it).

For this purpose the information is provided exclusively for the above mentioned Website and not for other websites that the user may access via links on this website.

By visiting the present Website you implicitly declare that the data processing and usage described in this privacy policy are understood and accepted.

### Purpose, legal basis and any other information

The purpose for which ATVO S.P.A. collects and processes data, the legal basis we rely on for the processing, the manner of handling, the storage period, the related rights and any other information required by legislation, are provided in the information set out in the following paragraphs or in the notices accompanying the specific processing and provided to the data subject in the phases preceding the possible provision of a service.

**The controller** is ATVO S.P.A., with registered office in Piazza IV Novembre, 8 – 30027 San Donà di Piave (VE), in the person of its pro tempore legal representative, who may be contacted at the e-mail address: [atvo@atvo.it](mailto:atvo@atvo.it)

**The Data Security Officer** (RDP / DPO) of the Company ATVO S.P.A. may be contacted at the e-mail address: [dpo@atvo.it](mailto:dpo@atvo.it)

**The Personal Data Controllers and Processors.** The personal data processing is carried out at the Company's head office for the purposes specified in this privacy policy, including the purpose of direct marketing in case of consent given by the user. The personal data processing related to the web services of this site and for other purposes is carried out by the Controller's internal personnel, identified as Data Processor, and, for the maintenance and handling of this website, also by external staff, specifically appointed as external data processor.

Personal Data may be transmitted to External Organisations to comply with legal requirements relating to the completion of the contract for the supply of goods or for the provision of services; the external staff who carries out processing of personal data has been appointed by ATVO S.P.A, as responsible for the personal data themselves.

Any processing of personal data abroad, in either paper and dematerialised form, is carried out only and exclusively at Foreign Organisations that were recognised by the Representative Bodies of the European Union and in compliance with the EU Regulation 679/2016.

## **Provision of Transportation Services, management of parking areas**

Personal data furnished by users who request the provision of services or the transmission of informative material, are collected as necessary to provide the requested service and used only to perform the required service or benefit.

The above mentioned data may be used by the Company also for the fulfilment of following purposes: a) client or direct customer relationship management; b) the conduct of the Company's business; c) other purposes related to the company's activity and connected to it (for example to improve the offered products and services, even if not strictly related to the services requested by the data subject; customer satisfaction market research, etc.). If it will be necessary to gather data to identify the users in order to provide them with a specific service, the users are asked to voluntarily insert the required data, and those will be exclusively processed to supply such service.

The company ATVO S.P.A. may use the contact details in order to: send to the users further information about the company itself; send to the users regular surveys related to the customer satisfaction or to market research. The user can revoke at any time the consent given for the receiving of marketing communication or for the participation in surveys.

## **Video Surveillance**

For specific technical reasons, related for example to the verification of loads on board and/or to the presence of users at a bus stop and/or to the road traffic situation, or else with reference to any unlawful conduct that may affect the company's assets, or for purposes aimed at increasing safety of the passengers or of the employees in all company's local units, it may be necessary to make shootings with video-surveillance devices, that record the detected images.

The images constitute personal data of those who may be filmed by the devices. The modes of shooting, management and preservation of the recordings are regulated by internal procedures aimed at ensuring the compliance with the methods of processing provided for by the EU Regulation 679/2016.

## **Direct Marketing**

In the event that you have expressly authorized us to do so by ticking the appropriate flag during the collecting and recording of your data, we may send you information about the services or products by e-mail, mail or phone, unless you have specified otherwise in the course of registration. If at any time, you wish that your data are not to be used for marketing purposes, you may notify us by getting in touch with our customer service via e-mail at the address [atvo@atvo.it](mailto:atvo@atvo.it) and we will not send you any more commercial communication. If in the collection of your data you denied the consent to their processing for marketing purposes, you will never receive any commercial communications and the data provided by you will be exclusively used to reply to your request.

## **Navigation Data**

The software systems and procedures required for the smooth functioning of this website, will log certain personal data which require internet communication protocols before being transferred. This kind of information is not acquired to be associated to identified data subjects, but might by its very nature, if further processed and correlated with data held by third parties, allow to identify users. The kind of data involved includes IP addresses or domain names of computers used by users connecting to the website, the addresses in the notation URI (Uniform Resource Identifier) of the requested resources, the date and time of the request, the method used in submitting the request, the size of the file obtained in response, the numerical code indicating the status of the response given by the server and other parameters relating to the operating system and to the user's computer environment.

These data are only used in order to obtain anonymous statistical information about the way the website is used and to ensure it is working properly, and will be cancelled immediately after the processing. The data may be used exclusively by the Judicial Authorities to determine liability in case of hypothetical cybercrimes damaging the website.

## **Cookies**

The cookies are automatically created by a server and stored in text files on the hard drive of your computer. They facilitate the operation of our website, the use of a specific functionality actively requested by the user or they allow to improve the performance of this website, such as the cookies that make browsing faster or that show contents that are most relevant to the users according to their previous choices. Cookies can be permanent (so called persistent cookies), but can also have a limited duration (so called session cookies). This website uses both. The session cookies are not stored permanently in your computer and vanish after the browser will be closed. The persistent ones are used to customize the browsing, depending on the instrument used by the user (computer, tablet, smartphone), as well as the third parties cookies that are used to analyze the site access (for ex, Google Analytics) and to allow users to share the website content through the social networks (FB) or via e-mail (Add This). These cookies are stored permanently on your computer and have a variable duration.

## Third Parties Cookies

### Google Analytics Cookies

Our website may use Google Analytics by Google Inc., a service that offers measurement statistics and analyses of site performance, by means of Cookies. To see the Privacy Policy of Google Analytics Service, visit the web page

<http://www.google.com/intl/en/analytics/privacyoverview.html>. For the Google's privacy regulations please see the following address:

<http://www.google.com/intl/it/privacy/privacy-policy.html>.

### Google (Analytics, Youtube, Adwords, Plus)

This website might use the program Google Adwords and the Google Remarketing Technology. Both are operated by Google Inc. The function that monitors AdWords also uses cookies. A cookie is added to the computer of users when they click on an ad to help us keep trace of sales or other conversions. This cookie expires after 30 days and does not gather nor monitor personally identifiable information. Users can deactivate the conversion tracking cookies in the settings of their internet browser. Finally the user can deactivate Google Analytics Cookies using a specific plug-in that can be downloaded by following the link below:

<https://tools.google.com/dlpage/gaoptout>. For further information on cookies set by Google or by the services owned by it (Youtube, Google+, Adwords) please see following page:

<http://www.google.it/intl/it/policies/technologies/cookies/>

### Facebook Cookies

This website might use cookies by Facebook Inc. to monitor the performance of the Facebook Ads campaigns and possible remarketing actions. For further information about the use of cookies by Facebook, please click here: <https://www.facebook.com/help/cookies/>.

### Twitter

This website might use cookies by Twitter Inc. For further information about the use of cookies by Twitter, please click here: <https://twitter.com/privacy>.

### Instagram

This website might use photos or videos sourced from Instagram that require the use of third-parties cookies originating from Instagram. For further information, please click here: <https://instagram.com/about/legal/privacy/>.

### Trip Advisor

This website might use cookies by Trip Advisor Inc. For further information about these cookies, please visit the website: <http://www.tripadvisor.co.uk/pages/privacy.html>.

### Add This.

This website might use cookies by Add This. For further information about these cookies, visit the website <http://www.addthis.com/privacy>.

### Flickr

This website might use photos or videos sourced from Flickr Service, owned by Yahoo. For

further information about the cookies by Yahoo, please visit following website: <https://policies.yahoo.com/ie/it/yahoo/privacy/topics/cookies/index.htm>.

## Cookie removal

The users may oppose the registration of persistent cookies on their hard disk by configuring their browser so as to disable cookies. You can find more information about disabling cookies in the main browsers: Chrome, Firefox, Internet Explorer, Safari, Opera. After this operation, however, some functions of the webpages may not be performed correctly.

Data provided voluntarily by the user. The optional, explicit and voluntary sending of e-mails to addresses reported in this website, or the completion of the form, automatically implies the collection of data regarding the sender's address, necessary to respond to requests, and of any other possible personal data included by the user in the message.

## Provision of Data

The users are free to provide the personal data stated on the request forms or otherwise indicated in specific sections of the website to request information material or other information. The failure to provide the data does not make it impossible to obtain what is requested in an anonymous form. Personal data are automatically processed for the strictly necessary time needed to achieve the purposes for collecting the aforementioned data. In order to avoid loss of data, illegitimate or not correct uses and not authorized access, specific safety measures are observed.

## Methods of Processing

Your personal data are automatically processed for the strictly necessary time needed to achieve the purposes for collecting the aforementioned data. In order to avoid loss of data, illegitimate or not correct uses and not authorized access, specific safety measures are observed. Users have the right at any time to obtain confirmation as to whether or not personal data concerning them exist, and to know their content and origin, updating or integration (art 13 Reg. EU 679/16 and subsequent amendments). According to the same article, the users have the right to ask for the cancellation, the conversion into an anonymous form or for the block of the data processed violating the law, as well to oppose for valid reasons the processing of said data.

## How to exercise the rights

The data subjects may exercise at any time the above mentioned rights, by writing:

- a registered letter to: ATVO S.p.A. , Piazza IV Novembre, 8 - 30027 San Donà di Piave (VE)
- an e-mail to the address: [atvo@atvo.it](mailto:atvo@atvo.it)
- a pec to the address: [segreteria@pec.atvo.it](mailto:segreteria@pec.atvo.it)

The users will not incur any expenses when exercising their rights, unless their requests are clearly unfounded and/or excessive and/or repetitive. In this case the

Controller may charge a reasonable fee, taking into account the administrative costs incurred, and or reject the request.

## **Amendments to the Privacy Policy Statement**

This Privacy Policy statement may be periodically updated and the personal data processing is subject to the privacy policy statement ongoing at the time of processing of the above mentioned data.

**San Donà di Piave, 01/03/2024**