

## Privacy Policy

[Last update: 11/11/2021]

**What is this document?** Pursuant to art. 13 European Reg. n. 679/2016 (“**General Data Protection Regulation**” or “**GDPR**”) and in compliance with the principles contained therein, blubrake s.r.l. intends to inform each user (the “**User**”) about the processing of personal data happening on its website.

### Controller and contact detail

Blubrake S.p.A. (hereinafter “**Blubrake**” or “**Controller**”, pursuant to art. 4(7) GDPR) with registered offices in Via San Martino 12, 20122 Milan (Italy)  
[info@blubrake.it](mailto:info@blubrake.it)

### Purpose of processing, Legal Basis, Personal Data and Retention Period

The Controller processes Personal Data for the following purposes, as specified here in below. The table also shows the legal basis which justifies the processing and the period of data retention:

Purpose	Personal data	Legal basis	Data retention
Provision of the services, dealer account creation and management.	✓ Anagraphic information ✓ Contact details	Performance of a contract [Art. 6, 1, lett. b) GDPR]	Until the dealer deletes the account.
Contact and customer care.	✓ Anagraphic information ✓ Contact details	Performance of a contract [Art. 6, 1, lett. b) GDPR]	For the period of time necessary to answer the customer.
Send newsletters and/or other materials for marketing communication purposes.	✓ Anagraphic information ✓ Contact detail	Consent [Art. 6, 1, lett. a) GDPR]	Until the withdrawal of consent and in any case not later than 24 months from the date of the last contact.
Allow the Controller to accomplish all formalities required by law.	✓ Anagraphic information ✓ Contact details	Legal obligation [Art. 6, 1, lett. c) GDPR]	Until the expiry of the data retention period, as provided by the applicable law.

Improve the Website by analyzing how Users navigate and/or use the Website.	✓ IP address	Legitimate interest [Art. 6, 1, lett. f) GDPR]	Not applicable (aggregate or anonymous data)
Detecting or preventing fraudulent activity and exercising the Controller's rights in Court.	✓ Anagraphic information ✓ Contact details ✓ Professional information	Legitimate interest [Art. 6, 1, lett. f) GDPR]	10 years

In case the User prefers not to communicate mandatory and/or necessary data for the fulfilment of certain purposes, Blubrake reserves the right to not provide the service through its Website.

### Processing modalities

The processing of Personal Data will take place through automated and/or manual tools in order to ensure proper security measures to prevent access, disclosure, loss, incorrect, illegal or unauthorized use of data.

### Data Sharing

Your Personal Data may be shared with the following subjects, on a need-to-know basis and in accordance with Applicable Privacy Laws: (i) Internet service providers and platforms used by the Controller as organisation tools, channels of communication and/or promotion; (ii) third-party consultants and other third-party service providers who perform services for us or on our behalf and require access to such information to do that job; (iii) parent Company (E-Novia S.p.a.) and its subsidiary Companies.

All of the relations with the subjects listed above are - and will be - formalized with a contract pursuant to Art. 28 GDPR (Data Protection Agreement or "DPA").

Personal data will be processed by internal staff specifically authorized under Article 29 of the GDPR. The names of all authorized personnel are available under request to the Data Controller, at [info@blubrake.it](mailto:info@blubrake.it).

### Data processing locations

Personal data is processed at the headquarters of the Controller, as well as in the servers that host the website. The Data Controller ensures that when using cloud providers established outside the EEA, the processing of personal data by these recipients is carried out in accordance with applicable law. Transfers shall be carried out by means of appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards provided for in the GDPR.

### Data Subjects' rights

The User may exercise all the rights provided for by Articles 15-21 of EU Reg. no. 679/2016, at any time and without unjustified limitations, by contacting the Data Controller at [info@blubrake.it](mailto:info@blubrake.it). Requests shall be filed free of charge and processed by the Controller within 30 days.

Specifically, the User can:

- Obtain from the controller confirmation as to whether or not personal data are being processed (Art.15);
- Obtain from the controller the rectification of inaccurate personal data (Art. 16);
- Obtain from the controller the erasure of personal data (Art. 17);
- Obtain from the controller restriction of processing (Art. 18);
- Have the right to receive the personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (Art. 20);
- Have the right to object (Art. 21);

### **Complaints**

In any case, Users are always entitled to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), under Art. 77 of the Regulation, if they believe that the Data Controller's processing of their Personal Data is in violation of the applicable law.

### **Amendments**

The Controller reserves the right to amend and update the Privacy Policy as a result of any further new or revised provisions of any national and EU laws and regulations on personal data protection.