



Livenza Servizi Mobilità S.r.l.

PRIVACY POLICY FOR USERS
(PROVIDED PURSUANT TO ART. 13 OF THE EUROPEAN GENERAL DATA PROTECTION REGULATION 2016/679)

Dear Sir/Madam (hereinafter "Data Subjects")
in accordance with art. 13 of the EU General Data Protection Regulation 2016/679 (hereinafter "GDPR") the company LIVENZA SERVIZI MOBILITÀ S.R.L ("Company" or "Data Controller or simply Controller" or "LSM") as better identified hereafter – within the framework of an existing contractual relationship (hereinafter also referred "Contractual Relationship or even merely Relationship") with the natural person or legal entity (partnership or limited company, associations, foundations, professional, body, business and so forth) in relation to whom you hold a role (i.e. employee, collaborator, pro tempore legal representative, owner, person in charge, authorised person ..) – may process your personal data (below "Data"). As a result, by the present document (hereafter "Policy"), the Company intends to provide you with the following information.

This Policy is not precluded from being provided to you in different ways or timescales.

Table with 1 column and 7 rows containing General Definitions: Personal Data, processing, Controller, Processor, and Types of Data Processed.

Table with 2 columns: Role (DATA CONTROLLER, DATA PROTECTION OFFICER (DPO)) and Contact Information (LIVENZA SERVIZI MOBILITÀ S.R.L, Via Giuseppe Mazzini, 11, dpo@lsm.it).



The various data processing purposes for which the Company operates toward the User as Data Controller are detailed below, by dividing them into specific sectors of reference.

PURPOSE OF THE PROCESSING			
	<p>Purposes for which the processing does not require your consent. Your failure to provide the data in whole or in part will result in the impossibility for the Data Controller to process your data within the framework of the Relationship and therefore, possibly, to give fulfilment to the Relationship itself due to such a failure to provide it.</p>		
PARKING SECTOR AND SUBSCRIPTIONS			
	Purpose	Legal basis of the processing	Categories of data processed
1	Visual inspection activities on the territory for parking management and license plate capture by photo in case of violation.	<p>(Art. 6, paragraph 1, letter B GDPR) The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR) The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR) The processing is necessary to pursue the legitimate interests of the Data Controller (processing in the performance of institutional duties); (Art. 6, paragraph 1, letter E GDPR) The performance of a task carried out in the public interest or the exercise of official authority. For special categories of data (Art. 9, paragraph 2, letter G) the processing is necessary for reasons of substantial public interest; (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.</p>	Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health).
2	Management of car parking subscriptions both for residents and for those who declare to work in an area with parking spaces (marked in blue).	<p>(Art. 6, paragraph 1, letter B GDPR) The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR) The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR) The processing is necessary to pursue the legitimate interests of the Data Controller (processing in the performance of institutional duties); (Art. 6, paragraph 1, letter E GDPR) The performance of a task carried out in the public interest or the exercise of official authority.</p>	Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health).



		For special categories of data (Art. 9, paragraph 2, letter G) the processing is necessary for reasons of substantial public interest; (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.	
3	Subscription management for pregnant women or for users who are in maternity or paternity.	(Art. 6, paragraph 1, letter B GDPR) The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR) The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR) The processing is necessary to pursue the legitimate interests of the Data Controller (processing in the performance of institutional duties); (Art. 6, paragraph 1, letter E GDPR) The performance of a task carried out in the public interest or the exercise of official authority. For special categories of data (Art. 9, paragraph 2, letter G) the processing is necessary for reasons of substantial public interest; (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.	Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, and contact details in general).
4	Management of the activity of notification of fines for the Municipality of Polcenigo, excluding the collection activity.	(Art. 6, paragraph 1, letter B GDPR) The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter E GDPR) The performance of a task carried out in the public interest or the exercise of official authority.	Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general).
TECHNICAL SECTOR			
5	Management of state property maintenance and snow emergency and municipal signage.	(Art. 6, paragraph 1, letter B GDPR) The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter E GDPR) The performance of a task carried out in the public interest or the exercise of official authority.	Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general).
6	Maintenance management of public assets, including	(Art. 6, paragraph 1, letter B GDPR)	Common personal data within the meaning of Art. 4, paragraph



	the collection of citizens' insurance data in the event of damage caused to public land and reported by the competent authority.	<p>The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR)</p> <p>The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR)</p> <p>The processing is necessary to pursue the legitimate interests of the Data Controller (processing in the performance of institutional duties); (Art. 6, paragraph 1, letter E GDPR)</p> <p>The performance of a task carried out in the public interest or the exercise of official authority.</p> <p>For special categories of data (Art. 9, paragraph 2, letter G) the processing is necessary for reasons of substantial public interest; (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.</p>	1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health), criminal records pursuant to art. 10 GDPR.
SPORT FACILITIES SECTOR			
7	Maintenance management of turf and areas for sports activities of the sports hall	<p>(Art. 6, paragraph 1, letter B GDPR)</p> <p>The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR)</p> <p>The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR)</p> <p>The processing is necessary to pursue the legitimate interests of the Data Controller (processing in the performance of institutional duties); (Art. 6, paragraph 1, letter E GDPR)</p> <p>The performance of a task carried out in the public interest or the exercise of official authority.</p> <p>For special categories of data (Art. 9, paragraph 2, letter G) the processing is necessary for reasons of substantial public interest; (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.</p>	Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health).
8	Security service management for schools	(Art. 6, paragraph 1, letter B GDPR)	Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of



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	and users, and the rotation of accesses.	<p>The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR)</p> <p>The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR)</p> <p>The processing is necessary to pursue the legitimate interests of the Data Controller (processing in the performance of institutional duties); (Art. 6, paragraph 1, letter E GDPR)</p> <p>The performance of a task carried out in the public interest or the exercise of official authority.</p> <p>For special categories of data (Art. 9, paragraph 2, letter G) the processing is necessary for reasons of substantial public interest; (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.</p>	birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health).
TOURISM SECTOR			
9	Reception management of users in relation to tourism and information management for public events	<p>(Art. 6, paragraph 1, letter B GDPR)</p> <p>The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR)</p> <p>The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR)</p> <p>The processing is necessary to pursue the legitimate interests of the Data Controller (processing in the performance of institutional duties); (Art. 6, paragraph 1, letter E GDPR)</p> <p>The performance of a task carried out in the public interest or the exercise of official authority.</p> <p>For special categories of data (Art. 9, paragraph 2, letter G) the processing is necessary for reasons of substantial public interest; (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.</p>	Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health).
10	Organisation management of events and guided tours and gadgets	(Art. 6, paragraph 1, letter B GDPR)	Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of



		<p>The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR)</p> <p>The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR)</p> <p>The processing is necessary to pursue the legitimate interests of the Data Controller (processing in the performance of institutional duties); (Art. 6, paragraph 1, letter E GDPR)</p> <p>The performance of a task carried out in the public interest or the exercise of official authority.</p> <p>For special categories of data (Art. 9, paragraph 2, letter G) the processing is necessary for reasons of substantial public interest; (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.</p>	<p>birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health).</p>
11	Management of bike-sharing service	<p>(Art. 6, paragraph 1, letter B GDPR)</p> <p>The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR)</p> <p>The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR)</p> <p>The processing is necessary to pursue the legitimate interests of the Data Controller);</p> <p>For special categories of data: (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.</p>	<p>Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health).</p>
GREEN SECTOR (ENVIRONMENTAL?)			
12	Management of municipal green areas (e.g. parks, gardens) and machinery maintenance	<p>(Art. 6, paragraph 1, letter B GDPR)</p> <p>The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter E GDPR)</p> <p>The performance of a task carried out in the public interest or the exercise of official authority.</p>	<p>Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general).</p>
PURPOSE OF THE PROCESSING			



	<p>Purposes for which the processing requires your consent. Your failure to provide the data in whole or in part will make it impossible for the Controller to process your data but doesn't prevent the execution of the Relationship.</p>		
	Purpose	Legal basis of the processing	
13	<p>Management of parking subscriptions for residents, for those who declare to work in an area with parking spaces (marked in blue), for pregnant women or for cases of maternity or paternity, if there is no other legal basis for the processing.</p>	<p>(Art. 6, paragraph 1, letter B GDPR) The processing is necessary for compliance with a contract; (Art. 6, paragraph 1, letter C GDPR) The processing is necessary for compliance with a legal obligation to which the Controller is subject; (Art. 6, paragraph 1, letter F GDPR) The processing is necessary to pursue the legitimate interests of the Data Controller (processing in the performance of institutional duties); (Art. 6, paragraph 1, letter E GDPR) The performance of a task carried out in the public interest or the exercise of official authority. For special categories of data: (Art. 9, paragraph 2, letter A) consent of the Data Subject; (Art. 9, paragraph 2, letter G) the processing is necessary for reasons of substantial public interest; (Art. 9, paragraph 2, letter F) the processing is necessary for the establishment, exercise or defence of legal claims.</p>	<p>Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health).</p>
14	<p>Management of marketing and communication services, also through newsletters.</p>	<p>(Art. 6, paragraph 1, letter A GDPR) - consent of the Data Subject;</p>	<p>Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general).</p>
15	<p>Publication management of photos on the website or social pages for the tourism sector.</p>	<p>(Art. 6, paragraph 1, letter A GDPR) - consent of the Data Subject. For special categories of data: (Art. 9, paragraph 2, letter A) consent of the Data Subject.</p>	<p>Common personal data within the meaning of Art. 4, paragraph 1 no. 1 GDPR (such as date of birth, fiscal code, contact details in general) and data belonging to special categories pursuant to art. 9 GDPR (e.g. data related to health).</p>
DATA RECIPIENTS			
	<p>Your data will be neither disclosed nor made accessible and available to third parties, except for the communications carried out by the Controller – without being required to ask for your consent – in compliance with legal and contractual obligations and that shall be performed within the EU solely for the purposes indicated below.</p>		
Third parties or categories	Purpose	Notes/annotations	



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PPA; local authorities; Command of the Fire Brigade; Municipalities; Agencies, Public Authorities.	Management of the Company's institutional purposes.	Information is stored by DPO
IT Companies	Management, maintenance, updating of the systems and software used by the Controller and Video surveillance systems;	Appointment as External Data Processor (art. 28 GDPR) Information at DPO
Consultants, professionals, law firms, arbitrators, insurance companies, experts, brokers	Management of labour law, tax, welfare, social security contributions and remuneration aspects; Legal, extra-judicial and insurance activities in the event of claims.	Appointment as External Data Processor (art. 28 GDPR) Information at DPO
Network providers, electronic communications services, and IT and telematic services for the storage and management of computer data.	Hosting, Housing, Cloud, Saas and other remote computer services are essential for the provision of the activities of the Controller.	Appointment as External Data Processor (art. 28 GDPR). Cloud Services may involve data processing in countries outside the EU, which guarantee appropriate confidentiality rights. Information at DPO
Service Company	Management of the outsourced data services.	Appointment as External Data Processor (art. 28 GDPR) Information at DPO

DURATION OF PROCESSING	
<p>The Controller processes your data using manual and computerised and/or telematic means, by implementing appropriate security and organisational systems to ensure the maximum protection of the data provided.</p> <p>The data processed will be stored for the period of time strictly necessary required for the prosecution of the aforementioned purposes and in any case provided by legal regulations in force or for the entire duration of the relationship and for ten years thereafter.</p> <p>The data shall not be transferred abroad unless it is not required under the EU Regulation 679/2016.</p>	
Personal Data and Documents	Retention period and any determining criteria
Registration, accounting records, tax and accounting documents, communications, contract.	Duration of the commercial cooperation (establishment of negotiations, execution of the contract) and, subsequently, for the time in which the Controller is subject to conservation obligations for purposes foreseen by the law in force.
Number plate image data extracted by photo for visual control activities in the territory in the event of violations.	Duration necessary to establish the infringement and any related investigation and in any case no longer than two years from the end of the purpose for which the survey was carried out
Data relating to management, organization, fulfillment, and termination, however directly or indirectly connected to the Commercial Relationship.	The duration of processing will be limited to the time necessary to carry out the Relationship, except for the storage of data, information, files, and logs necessary to provide proof of the exact fulfilment of the obligations (until the expiry of the limitation periods for rights arising from the contract or rights for non-contractual liability related to the contract) and pursuant to the law. Information at DPO



RIGHTS OF THE DATA SUBJECT		
	We inform you of the existence of certain rights on personal data and relevant treatment that you may request from the Controller.	
Right	Description	Mode
Right to withdraw consent (art. 7, paragraph III, art. 13 paragraph II, letter A e art. 9 paragraph II, letter A)	You have the right to withdraw your consent for the processing for which is required. Data processing done up to the time of withdrawal will continue to be legitimate.	Forms on the website
Right to rectification (art. 16)	You have the right to request the rectification of inaccurate personal data that relates to yourself and to complete data that is incomplete.	Forms on the website
Right to be forgotten (art. 17)	You have the right to obtain from the Controller the removal of personal data concerning you if data are no longer necessary with respect to the purposes for which they were collected or otherwise processed, you have withdrawn your consent, if there are no overriding legitimate grounds for the profiling processing, if data has been processed unlawfully, if there is a legal obligation to delete it.	Forms on the website
Right to restriction of processing (art. 18)	You have the right to obtain the restriction of processing from the Controller when you have disputed the accuracy of your personal data (for a period enabling the Controller to verify the accuracy of the personal data) or if the processing is unlawful, but you oppose the erasure of the personal data and instead require that the processing be limited or if it is for you necessary for the assessment, exercise or defence of a right in court, while the Controller is no longer used for treatment purposes.	Forms on the website
Rights to portability (art. 20)	You have the right to receive the personal data concerning you which you have given us in a structured, commonly used machine-readable format and have the right to transfer this data to another Controller if the processing has been based on the consent, on a contract and carried out by automated means unless such processing is necessary to fulfil a task in the public interest or connected with the exercise of official authority and that such transmission does not infringe the right of a third party.	The right shall be exercised by opening an appropriate procedure before the DPO
Right to access to the Supervisory authority for the personal data protection		
<p>The exercise of the above rights is subject to the limitations, rules and procedures laid down in the EU Regulation 679/16, which you are bound to know and implement.</p> <p>In accordance with the provisions of art. 12, paragraph 3, moreover, the Controller shall provide information on action taken without undue delay and in any event within 30 days of receipt of the request.</p> <p>If necessary, this time limit may be extended by 60 days, taking into account the complexity and number of the requests.</p> <p>The Controller shall inform the Data Subject of any such extension within 30 days of receipt of the request, together with the reasons for the delay.</p>		



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HAVING READ THE PRIVACY POLICY

I, the undersigned

FIRST NAME

LAST NAME

After reading this Policy

AGREE

DO NOT AGREE

to the processing of data belonging to special categories for the purposes referred to in no. 13-14-15 of the "Purposes", that is for the management of marketing services and newsletters, for the publication of photos on the website or social pages for the tourism sector as well as for the management of parking subscriptions for residents, for those who declare to work with parking spaces (marked in blue), for pregnant women or in cases of maternity or paternity, where the processing is not justified by one of the alternative legal bases referred to in no. 2-3 of the "Purposes".

I declare I have read, understood, and received the policy relating to the processing of personal data.

Date _____

Signature _____