

This Privacy Notice explains how personal data (“Data”) provided by you to - and collected by Astra Veicoli Industriali S.p.a (“we”, “us”, “our”, or the “Company”) through this website will be handled in compliance with applicable laws and regulations. We are committed to protecting and respecting your privacy.

1. HOW WE OBTAIN DATA

Data that may be collected, processed and stored are the following:

- a. Identification and contact information, such as name, surname, email address, mail address and phone number(s)
- b. Professional information such as your company email, job title and reporting manager
- c. Browsing Information or data arising from you interacting with our website (such as Ip address, logs, browser type,)
- d. Cookies (please refer to the Cookie Notice, which explains the use of cookies and other web tracking devices via our website).

Ordinarily, you will have provided such Data to us, but in some cases, we may collect Data about you from a third party or from public records. We protect Data obtained from such third parties according to the practices described in this privacy notice.

2. HOW WE USE DATA

Data collected may be processed by us for the following purposes:

- i. to provide you information about our products and services;
- ii. to perform the obligation related to the sale of the product, such as allowing you to purchase the product, providing after-sales services and deal with any request you may have;
- iii. to allow you to access to specific discount based on clustered profile types (such as employees, dealer, importers, etc.)
- iv. to comply with laws, regulations as well as to exercise defense in case of compliant or legal actions;
- v. to ensure asset and information security, to maintain the safety, security, quality, and integrity of our website, databases and other technology assets, including to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity, and to debug to identify and repair errors that impair existing intended functionality.
- vi. subject to specific consent, sending commercial communications and newsletters as well as advertising on our products and services or performing market researches. All these activities could be done in hardcopy, by automated or electronic means including via mail or e-mail, phone (e.g. automated phone calls, SMS, MMS, fax) and any other means (e.g. web sites, mobile apps) - “Marketing”;
- vii. subject to specific consent, communicating the Data to our subsidiaries and affiliates as well as our authorized dealer and distributor network. Such partners will process Data with the purpose of sending commercial communications as well as advertising on their products and services or perform market researches - “Marketing Third Party”.

Data is collected and processed on the basis of the contract under points (i), (ii) and (iii), our legitimate interest for the processing under point (v) and to comply with law for the processing under point (iv).

Data may be processed electronically within IT systems, and manually, in paper form. Data will be processed and stored for its whole lifecycle, ensuring security and confidentiality of the same in compliance with principles of fairness, lawfulness and transparency and in accordance with the provisions of applicable laws and regulations.

3. CONSEQUENCES OF FAILURE TO PROVIDE DATA

Submitting Data is never mandatory. However, not providing Data marked as mandatory may prevent us from providing the required service or the product or may result in suboptimal provision of the required service or product. On the other hand, not providing Data marked as optional will allow you to access the service or to receive the product in any event.

4. HOW WE SHARE YOUR DATA

We are part of the Iveco Group, a company specializing in the construction of commercial vehicles. Data may be shared and communicated to our subsidiaries and affiliates and joint ventures participated, directly or indirectly by Iveco Group (see the list on the "Annual Financial Statements Report" published on the website ivecogroup.com), service providers, authorized dealers and distributors and business partners, based in and outside the European Union, which are under specific contractual obligation and may use it solely for the fulfillment of the purposes listed above.

Data may be communicated to third parties to comply with legal obligations, to operate and maintain our and the Iveco Group security, protect our and the Iveco Group rights or property, to respond to order of Public Authorities, or to exercise our rights before judicial authorities.

5. HOW WE TRANSFER YOUR DATA

In order to perform Data processing activities as detailed above, we may transfer Data in countries outside of the European Economic Area (EEA), including storing such Data in digital or physical databases managed by entities acting on our behalf. Database management and Data processing are limited to the purposes of the processing and are carried out according to applicable data protection laws and regulations.

In case Data are transferred outside of the EEA, the Company will use any appropriate contractual measures to guarantee adequate protection of the Data, including – among others – agreements based on Standard Data Protection Clauses adopted by the EU Commission applicable to the transfer of personal data outside the EEA.

6. RETAINING YOUR PERSONAL DATA

We maintain Data in our systems and archives for as long as necessary to pursue the purposes described in this Privacy Notice taking into account, when applicable, legal and contractual requirements.

When Data is no longer necessary for the purposes for which it is processed, Data is deleted or kept in a form which does not permit the identification of data subjects, provided that we are not legally required or permitted to hold such Data. We may continue to store Data for a longer period, as may be necessary to protect our interests related to potential liability connected to the provision of the services or products or the processing of Data.

7. DATA CONTROLLER

Astra Veicoli Industriali S.p.a with registered office in Piacenza, via Caorsana 79 – Italy, is the Controller for the Data it collects, processes and stores in the framework of this Privacy Notice.

8. YOUR RIGHTS REGARDING YOUR DATA

You may exercise your rights as defined by applicable laws and regulations, among these:

- Right of access: right to obtain from the Controller a confirmation as to whether or not your personal information is being processed, and, if so, to demand to gain access to your personal data.

- Right of rectification: right to obtain from the Controller the rectification of your personal data that you may consider inaccurate and to have incomplete information being completed, including by means of providing a supplementary statement.
- Right to erasure: right to obtain from us the erasure of your personal data without undue delay, where the request is made in accordance with the applicable laws and regulations.
- Right to object to data processing: right to object at any time to the processing of your personal data based on the legitimate interest of the Controller.
- Right to limit the data processing: right to obtain from the Controller a limitation on the processing activities when the accuracy and the precision of personal data is disputed, and for the time necessary for the Controller to verify the accuracy of personal data.
- Right to data portability: right to receive the personal data you provided to the Controller in a structured, commonly used and machine-readable format. You also have the right to transmit that data to another data controller without hindrance from the Controller, especially following these conditions: the processing is based on consent or on a contract and the processing is carried out by automated means.
- Right to make a complaint: without prejudice to any other administrative or judicial dispute, if you believe the data processing has been carried out illicitly or not compliant with applicable laws and regulations, you have the right to raise a complaint with the Supervisory Authority of the Member State in which you reside or work habitually, or of the State where any breach has occurred.

You can exercise the abovementioned rights by contacting us as follows:

- Filling the online form you can find [here](https://www.ivecogroup.com/policies_and_guidelines/privacy_request_form) [www.ivecogroup.com/policies_and_guidelines/privacy_request_form]
- Writing an email to privacy-compliance@ivecogroup.com
- Sending a letter to the Controller at the address indicated in the section 7 of this Privacy Notice, specifying “for the attention of Privacy Compliance”

Should you send us a request, we may need to obtain additional personal information from you to verify your identity and contact you, if necessary. This information, together with other Data we already withhold, will then be processed to meet your request, as required by applicable law. Where necessary, certain information may be transferred to other companies within or outside the Iveco Group that act as data processors of your Data, in order to meet your request. Your Data will be processed for the necessary amount of time to evaluate and handle your request, after which your Data will be archived for a suitable time period allowing us to demonstrate that the request has been handled correctly and timely.

9. UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice was updated in December 2023. We reserve the right to amend or update the Privacy Notice from time to time to reflect changing legal requirements or our processing activities. We will publish any update on this website and it will be effective upon posting. We encourage you to periodically review this Privacy Notice to learn how we protect your Data.