

PRIVACY POLICY

This notice describes how personal data are processed on the website www.mybestinparking.it (the "Site").

1. Mandatory privacy notice statement

Personal data are protected by the applicable data protection laws. Personal data means any information relating to an identified or identifiable natural person. We take the protection of your personal data seriously. For this reason, we process your data exclusively on the basis of the legal provisions pursuant to Articles 13 and 14 of Regulation (EU) 679/2016 (the "GDPR"). In this data protection notice you will find information about which personal data we collect on our website, why we need them, how we use them, and who you can contact if you have any questions.

2. Data Controller

The Data Controller for the processing of personal data on the Site www.mybestinparking.it is: Best in Parking Group, including all companies, partners and car parks that are part of the Group, with registered office in Milan (MI), 20122, Via Pietro Calderon De La Barca 2, VAT No. 01301350219 (the "Controller").

3. Scope and purposes of processing

Personal data automatically collected when you visit the Site:

- Browsing data. The Controller automatically collects data about the device (PC, tablet, mobile phone or other mobile device) and the connection used by the User, including, for example, the IP address, date and time of access, hardware and software information, device event information and any crash data.
- Site usage data. The Controller collects information about how the User uses the Site, including, for example, pages and content viewed, searches performed, third-party applications on the Site that are used by the User, and links to third-party websites and applications clicked by the User. These data will be processed until their automatic deletion after 30 (thirty) days. The processing carried out for the above purposes pursuant to Article 6(1)(f) GDPR is based on the pursuit of the legitimate interest of the Controller or of third parties, while respecting the interests, rights and fundamental freedoms of the data subject. Mandatory personal data provided by the User: Data provided to create an account. If the User, via the "Login/Register" icon, decides to register on the Site, the Controller collects the User's e-mail address. After entering the initial data, the User will receive a confirmation e-mail containing a link to complete registration. The link is valid for 48 (forty-eight) hours: if it is not clicked within this period, the data provided will be automatically deleted. By accessing the link, the User can proceed with registration by completing the requested fields, which vary depending on the country of residence. In any case, it is always necessary to provide first name, last name, address and telephone number. Users resident in Italy must also provide: tax code (codice fiscale), gender, province and city of birth, as well as date of birth

(necessary to verify the tax code). If the User is an entrepreneur, they must also indicate the place of business and, depending on the country in which it is located, additional information such as VAT number, recipient code, certified e-mail (PEC) and other data needed to allow correct invoicing by the Controller. This information is necessary to allow the User to create an account with the Controller. If the User does not intend to provide the above data, they will not be able to create their private area. Data provided by the User to purchase subscriptions. If the User wishes to purchase subscriptions, after logging into their "Private Area", they must provide the data required to correctly finalize the contract. The required data vary depending on the type of contract and may include: first name, last name and date of birth of the natural person who will use the parking space, vehicle make, model and license plate number, Telepass or UNIPOLMOVE device number, BMOVE account data and other relevant information. If the User chooses to use the license plate or the Telepass/UNIPOLMOVE/BMOVE system for access but fails to provide the relevant data, they cannot be recognized by the automatic identification systems. In that case, the User may incur additional costs for using the facilities - costs that will be due regardless of the contract entered into via the Site and cannot be refunded. To make payment, the User must enter the payment method information. Such data are not collected or processed by the Controller, but are handled directly by Nexi. The User may choose to save the payment method data in their personal account to facilitate future transactions. In this case, the Controller receives from Nexi only an identifying token. If the User chooses not to save the data, they will need to enter them again for each payment. This information is necessary to ensure the proper and complete performance of the contract entered into by the User through the Site. These data are required to allow the User to purchase subscriptions on the Site; if the User does not wish to provide them, they will not be able to use this service. Data relating to access and parking in Limited Traffic Zones (ZTL). In some car parks located in areas subject to a Limited Traffic Zone (ZTL) or managed under agreements with the competent municipalities, the Controller may process data relating to the vehicle's license plate and access events, including through digital identification and automated payment systems such as UNIPOLMOVE, BMOVE or equivalent devices, in order to enable operational management of the parking service and proper compliance with the agreements with the competent public bodies. The data thus collected may be communicated to municipal administrations or to publicly owned companies entrusted with managing ZTL access, in compliance with personal data protection regulations and applicable agreements. The legal basis for the processing is Articles 6(1)(b) (performance of a contract) and 6(1)(c) (compliance with legal obligations) GDPR. Optional personal data provided by the User: Data provided through requests for information via e-mail. If the User explicitly and voluntarily requests information by e-mail to the addresses indicated on the Site, or uses the "Need help?" form in the "Support" section, the Controller acquires the User's e-mail address, first and last name, and any personal data included in the communication. For the "Need help?" form, the Controller also acquires the e-mail address, mobile phone number, permit number and any personal data and/or third-party data included in the message text. The processing carried out for the above purposes pursuant to Article 6(1)(b) GDPR is based on the performance of a contract to which the data subject is a party or on the performance of pre-contractual measures taken at the data subject's request, while respecting the interests, rights and fundamental freedoms of the data subject.

4. Processing methods and retention of personal data

The Controller ensures that personal data are processed in full compliance with the GDPR and applicable privacy regulations in the countries where the Controller operates, using manual, IT or telematic systems. Processing is carried out through automated tools and sometimes with the aid of artificial intelligence tools. The collected data will be protected with physical and logical methods aimed at minimizing the risks of unauthorized access, disclosure, loss and destruction of data, pursuant to Articles 25 and 32 GDPR. Data are processed for no longer than necessary to fulfill the purposes for which they were collected. If the Controller does not receive a deletion request, personal data will be retained for no longer than 10 (ten) years, starting from the date of the User's last access to the Site. User personal data may be retained for longer periods where this is necessary to comply with legal obligations incumbent on the Controller or to protect a right in judicial proceedings. At the end of these retention periods, the User's data are deleted or permanently anonymized.

5. Recipients of personal data

The collected personal data may be processed by parties or categories of parties acting, pursuant to Article 28 GDPR, as data processors, or pursuant to Article 29 GDPR, as persons authorized to process data. In some car parks - particularly those located in areas subject to a Limited Traffic Zone (ZTL) or managed under agreements with the competent municipalities - data relating to vehicle license plates and access events may be communicated to municipal administrations or to publicly owned companies entrusted with managing ZTL access, in compliance with personal data protection regulations and applicable agreements. Such communication is necessary to allow proper management of the parking service, access to areas subject to traffic restrictions, and compliance with obligations arising from agreements or legal provisions. Outside of the above cases, personal data will not be disclosed except to entities, bodies and authorities to whom disclosure is mandatory under laws or regulations.

6. Transfer of data to a third country or an international organization

Personal data collected through the Site/App may be transferred outside the national territory solely for the performance of the services requested through the Site/App, to provide the most appropriate responses to requests made, and to improve the services offered. Any transfer of data, including outside the European Union, will take place in full compliance with the GDPR and, where necessary, using the so-called Standard Contractual Clauses.

7. Data Subject rights

The User has the right to request at any time:

- confirmation as to whether or not personal data concerning them exist, even if not yet recorded, in a concise, transparent, intelligible and easily accessible form, using clear and plain language;
- information on:
- the origin of the personal data;

- the purposes and methods of processing;
- the legitimate interests pursued by the Controller or by third parties;
- the recipients or categories of recipients of the personal data;
- the Controller's intention, if any, to transfer personal data to a third country or an international organization;
- the retention period of the personal data;
- the logic applied, as well as the significance and the envisaged consequences of such processing for the data subject, in the case of processing carried out with the aid of electronic tools within an automatic process of collection and/or profiling;
- the identification details of the Controller, the processors, any appointed representative and the Data Protection Officer (DPO);
- the subjects and categories of subjects to whom personal data may be communicated or who may become aware of them as an appointed representative in the territory of the State, as processors or persons in charge.
- the possibility to lodge a complaint with a supervisory authority;
- updating, rectification, or - where they have an interest - completion of the data;
- erasure, anonymization or blocking of data processed unlawfully, including data whose retention is not necessary in relation to the purposes for which they were collected or subsequently processed;
- restriction of processing;
- portability of the personal data concerning them to another controller;
- withdrawal of consent to processing;
- objection, in whole or in part, on legitimate grounds, to the processing of personal data concerning them, even if relevant to the purpose of collection. To exercise these rights, the data subject may contact the Controller at any time with a written request - without formalities - at the following address: privacy@bestinparking.it. The Controller will respond to the User's requests no later than one month from receipt. Due to the complexity and number of requests received, this period may be extended by two months. In that case, within one month of receiving the request, the Controller will inform the User of the extension and the reasons. If the response is not considered satisfactory, the User may lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) (www.garanteprivacy.it). Pursuant to Article 37 GDPR, the Controller has appointed a Data Protection Officer (DPO), reachable at: dpo@bestinparking.com.

8. Amendments

This notice may be subject to changes. If substantial changes are made to the Controller's use of User data, the Controller will notify Users by publishing the changes with maximum visibility on its pages. Last updated: October 2025