

## **Privacy Policy**

### **INTRODUCTION**

The purpose of this policy is to describe the procedures for managing this application owned by FCA Italy S.p.A., as regards the processing of the personal data of its users.

FCA Italy S.p.A., in conformity with the regulations for the protection of privacy adopted in Italy and in Europe, intends to guarantee the privacy and security of the personal data of each user, consistent with the provisions of the Code of Conduct adopted.

Detailed processing information is provided each time in the pages relating to the individual services offered. This information seeks to define limits and methods for the processing of data relating to each service, on the basis of which users can freely give their consent and authorise the collection of data and its subsequent use.

### **TYPES OF DATA PROCESSED AND PURPOSE OF PROCESSING**

The application offers information and interactive content. During use, information about the user may therefore be collected as follows:

#### ***Data about browsing***

Data processing systems and software procedures for running this application may, during routine use, obtain certain personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected for association with identified interested parties; nevertheless, due to its nature, when processed and associated with data belonging to third parties, it may allow users to be identified.

This category includes IP addresses, operating system, device used, information about web pages visited by users of the application, access time, duration of stay on each individual page, internal path analysis (clickstream) and other parameters about the operating system and the IT environment of the user.

Such technical/IT data is gathered and used in an aggregated and anonymous form, solely in order to:

1. improve service quality;
2. obtain statistic information about use of the application.

#### ***Geographical location data***

Upon prior consent by the user, the application may send device location data - in a discontinuous way - to the IT systems used to provide the services requested by the user.

#### ***Data submitted voluntarily by the user***

This occurs when, after reading a detailed information letter, the user inputs personal details to the application for transmission to remote IT systems, in order to access specific, freely selected services.

“Opt-In” and “Opt-Out” policies: in all cases before activating a given service, suitable information is provided and, where necessary, consent for the processing of personal data is obtained. This consent may be revoked at any time, making it impossible to use the service concerned.

Specific processing information is presented or displayed on the pages of the application dedicated to each requested service.

#### ***Data of under-age persons***

FCA Italy S.p.A. does not allow personal data to be provided by persons under the age of 18.

### **PROCESSING PROCEDURES**

Data processing is carried out by automated means (e.g. using electronic procedures and systems) and/or manually (e.g. on paper) for the time strictly necessary to achieve the purposes for which the data was collected and, in any case, in accordance with current regulations on the subject.

### **PERSONS WHO MAY HAVE ACCESS TO YOUR PERSONAL DATA**

Your personal data may be processed by other parties working on behalf of FCA Italy S.p.A., bound by specific contractual restrictions and located in EU or non-EU countries, in the context and within the limits envisaged in arts. 43 and 44 letter b) of Decree no. 196/2003.

Your personal data may be released to third parties in order to comply with legal obligations, orders made by public authorities or for the purpose of exercising a right in court proceedings.

### **LINKS TO OTHER SITES**

The application contains links to other websites; this possibility is clearly indicated in order to inform the user when exiting the application.

The user is kindly advised to pay special attention, as FCA Italy S.p.A. does not own and is not responsible for these sites that are managed entirely by other companies/organisations, whose privacy protection policies must be checked and accepted where appropriate.

FCA Italy S.p.A. thus declines any and all responsibility for any requests for and/or release of personal data to the websites of third parties.

### **RIGHTS OF INTERESTED PARTIES**

Persons to whom the personal data refers have the right at any time to obtain confirmation of the existence or absence of the said data and to know its content and origin, check its accuracy or request additions, updates or corrections (art. 7 of Decree no. 196/03).

Under this article, users have the right to request a complete and up-to-date list of all data processing persons, to request the deletion, transformation into an anonymous form or blocking of data processed unlawfully and, in any case, to oppose its processing for legitimate reasons.

To exercise these rights and if you experience problems or wish to request clarification of this statement, please write to FCA Italy S.p.A. – Customer Experience & CRM - Privacy Office - Corso Agnelli 200 - 10135 Turin.

#### **CHANGES TO THE POLICY**

This Policy governs the procedures for processing the personal data provided by users when using the application. The introduction of new sector regulations, along with the regular analysis and update of the services provided to users, may require changes to be made to the above procedures. Accordingly, it is possible that our policy may change over time and users are therefore invited to read this page on a periodic basis.

*Date*