



Privacy policy and provider information for Social Media channels

With this Privacy Policy, we inform you about the processing of your personal data and your rights as a data subject in the context of our social media presences.

Our social media are managed by:

Athlon Car Lease S.r.l.

Via Carlo Veneziani 56

00148 Roma

Italia

marketing.italy@athlon.com

The contact details of our Data Protection Officer are as follows:

Mercedes-Benz Group AG

Chief Officer Corporate Data Protection

HPC E600

70546 Stuttgart

Germany

e-mail: data.protection@mercedes-benz.com

e-mail: protezione.dati@athlon.com (coordinamento per l'**Italia**)

General information

We are present in various social networks through freely accessible pages and profiles managed by us. When you visit these pages your personal data will be processed not only by us, but also by the provider of the respective social network which then acts as the controller for the collection and further processing of your personal data on the respective social network, e.g. via its websites and apps. If you contact us via social networks (e.g. via our social media page or channel), the provider of the respective social network will also process your personal data. Please note that this also applies if you do not have an account on the social network or if you are not logged into your existing account when you visit or use our social media page.

There is no legal or contractual obligation to provide us with your personal data. However, in order to be able to use all the functions of the social network and in particular of our website, your personal data may be required.

If you do not provide your data, some features may not be available or may only be available to a limited extent.

Information on the processing of personal data by the provider of the respective social network can be found in their privacy policy, which can be accessed via the link we have provided in the "Further information on the individual social networks" section of this data protection policy. These links may be updated from time to time.



As the operator of our social media pages, we can only display your public profile on the respective social network. The information you see on your public profile depends on the privacy settings you choose in your profile. Further information on privacy settings can be found in the respective privacy sections of the social networks.

Purpose of the processing

We process your personal data (such as your name and the content of your messages, requests or other messages addressed to us) when you contact us via our page on the respective social network. We process this data for the purpose of managing and, if applicable, responding to your posts and/or messages addressed to us.

In addition, the provider of the respective social network may provide us with so-called page insight and/or analysis data. This data is anonymous statistics that we use to evaluate the quality of our presence and content on social networks. These statistics are compiled on the basis of the usage data collected by the respective social network regarding your interaction with our social network page. We do not have access to individual usage data. The specific tracking and analysis techniques used by the social networks can be found in the respective tab in the "Further information on the individual social networks" section of this privacy policy.

Legal basis

The processing of your personal data described above is based on our legitimate interest, pursuant to Art. 6 par. 1 letter f) of the General Data Protection Regulation (GDPR). In particular, our legitimate interest lies in the possibility of contacting you in connection with your requests or contributions as well as knowing your preferences (e.g. number of so-called "followers", number of visits to individual areas of the page, user statistics based on age, geographical location and language) and, in addition, to improve the content offered on our social network pages and make them as relevant as possible to the target group.

Deletion of personal data

We store your personal data in our systems, i.e. outside the respective social network (e.g. when we use user communication management tools) only as necessary and only for as long as is necessary for the respective processing purposes or for as long as there are statutory retention obligations.

Transfer of data to recipients outside the European Economic Area

When you visit certain social networks, your personal data may be transmitted to recipients located in countries outside the European Union ("EU"), Iceland, Liechtenstein and Norway (= European Economic Area) and processed by them in those countries, in particular in the United States. Where there is no decision of the European Commission establishing an adequate level of protection of personal data (so-called "Prevention of Personal Data"). "adequacy"), we agree with recipients located in such other countries to use EU standard contractual clauses, binding corporate rules or other applicable instruments (if applicable) to create an "adequate level of protection" according to legal requirements.



In the following countries outside the EU/EEA, the EU has established an adequate level of protection for the processing of personal data in accordance with EU standards (the so-called "adequacy decision"): https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

Transfer of personal data to third parties

We may engage certain qualified service providers to design and support the operation of our social media pages. In such cases, we will only transmit your personal data to them if this is necessary for the purposes mentioned in the "Purposes of processing" section of this Data Protection Notice and where this is permitted by law or to the extent that there is a consent to such transmission.

Rights of the data subject

Right of access: pursuant to art. 15 GDPR you have the right to information about the personal data stored by us. This means that you have the right to obtain confirmation from us as to whether or not personal data concerning you is being processed and, where that is the case, to request access to the personal data. The access information includes - among other things - the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom the personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may limit your right of access.

Right to rectification: You have the right to have incorrect personal data corrected in accordance with Art. 16 GDPR. This means that you have the right to obtain from us rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to obtain the completion of incomplete personal data, including by providing a supplementary statement.

Right to erasure ("right to be forgotten"): You have the right to have your personal data erased pursuant to Art. 17 GDPR. This means that in certain circumstances you may have the right to obtain from us the erasure of personal data concerning you and we may be obliged to erase such personal data.

Right to restriction of processing: pursuant to art. 18 GDPR, you have the right to request the restriction of the processing of your personal data. This means that in this case the respective data will be marked and may only be processed by us for certain purposes (e.g. with your consent or to protect our interests in legal proceedings).

Right to data portability: pursuant to art. 20 GDPR, in certain circumstances, you may have the right to receive the personal data concerning you that you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to request the transmission of such data to another entity without hindrance from us.

Right to lodge a complaint with a supervisory authority: you also have the right to lodge a complaint with the competent data protection authority, in particular in the EU Member State where you habitually reside or where an alleged GDPR violation occurs.



In certain circumstances, you may have the right to object at any time, on grounds relating to your particular situation or where personal data is processed for direct marketing purposes, to our processing of your personal data and we may be required to stop processing your personal data. In addition, if your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, including profiling to the extent that it is related to such direct marketing. In this case, we will no longer process your personal data for these purposes. To exercise your right to object, you can contact us by email at:

athloncarlease.italy@legalmail.it.

To exercise your rights in relation to data processing by the provider of the respective social network, please contact them directly via the contact options provided on their websites. In other cases you can contact us by email at: athloncarlease.italy@legalmail.it.

For more information on how we process your personal data, please see our Data Protection Policy ([Informativa sulla Privacy](#))

More information about individual social networks

LinkedIn

We are present on LinkedIn. The provider of this social network is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland (hereinafter referred to as "LinkedIn"). More information on the processing of your personal data by the provider of this social network is available in the provider's privacy policy accessible at the following link: <https://www.linkedin.com/legal/privacy-policy>.

In connection with the operation of our LinkedIn profile, LinkedIn provides us with so-called page insights data. This information is anonymous statistics that we use to evaluate the quality of our LinkedIn profile and content. These statistics are compiled on the basis of usage data collected by LinkedIn through your interaction with our LinkedIn profile; We do not have access to individual usage data. More information on this can be found at the following link:

<https://www.linkedin.com/help/linkedin/answer/a1338708?lang=it>.

For the management of the page insight data, we have concluded a joint controllership agreement with LinkedIn pursuant to Art. 26 GDPR (<https://legal.linkedin.com/pages-joint-controller-addendum>).

Status: July 2024