

# Privacy policy

The following privacy policy is provided by the data controller, NextHub Digital AG, to describe the management methods of the site. <https://cartogo-europe.com/> (hereinafter also "Site") with specific reference to the processing of personal data provided by Users/Users/Interested Parties.

This notice specifies the methods, purposes, and limitations of data processing; it is provided in accordance with Art. 13 of Regulation (EU) 2016/679 (hereinafter "GDPR"), the Swiss Federal Data Protection Act (nLPD), and the United Kingdom General Data Protection Regulation (UK GDPR) to those accessing the NextHub Digital AG website. Switzerland is recognized by the European Commission as having an adequate level of data protection (Decision 2000/518/EC and subsequent updates).

The information refers exclusively to <https://cartogo-europe.com/> and not to other websites or sections/pages/spaces owned by third parties that may be consulted by the user through specific links.

Users are encouraged to read this Policy carefully before providing any personal information and/or completing any forms on the Site.

## 1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The data controller is NextHub Digital AG, based at Kreuzplatz 2, 8032 Zurich.

Pursuant to Article 27 of the GDPR, NextHub Digital AG has appointed a representative in the European Union to ensure compliance with local regulations.

**Data Protection Representatives** (In accordance with art. 27 of the GDPR)

Lawyer Claudia Chirico  
Via Nazionale 97, 84018 Scafati (Italy)  
+39 081 8633742 | PEC: [c.chirico@avvocatinocera-pec.it](mailto:c.chirico@avvocatinocera-pec.it)

The updated list of Data Processors, in accordance with Art. 28 of the GDPR, the Swiss Federal Data Protection Act (nLPD) and the UK GDPR, may be requested by sending a written request to the Data Controller using the contact details provided in Art. 8 of this Policy.

## 2. DATA COLLECTED

The personal data collected by the Data Controller during the use of the site consist of:

a. **Data provided by Users:**

When Users register for the services offered on the website <https://cartogo-europe.com/>, voluntarily provide the following personal data: full name, email address, telephone number, and postal code. The Data Controller may process this data for the service purposes mentioned in Article 3, point 1, of this Policy.

b. **Browsing data:**

The computer/electronic systems and software procedures used to ensure the proper functioning of the Site acquire, during their normal operation, some personal data. The transmission of this data is implicit in the use of web communication protocols or is useful for better management and optimization of the data and email sending system. This data collection, which is carried out exclusively for statistical purposes or to monitor the proper functioning of the Site, is in no way intended to identify the User. Web contact data is not retained after processing, except in the case of investigations into cybercrimes against the Site.

c. **Data for marketing and telemarketing purposes:**

With your prior consent, you may receive communications via email, SMS, or phone calls.

## 3. PURPOSE AND LEGAL BASIS OF THE PROCESSING - REGISTRATION ON THE SITE

The data provided is used to enable registration on the Site and access to its services. Legal basis: performance of a contract or pre-contractual measures (Article 6(1)(b) of the GDPR)..

The personal data provided by Users are collected and processed by NextHub Digital AG for the following purposes:

1. **Registration on the Site**<https://cartogo-europe.com/>

The data provided by the User will be processed for the purpose of providing the services offered by the Site and will allow the User to use the Services. The processing of personal data is based on Article 6 (2) of the GDPR, meaning it is necessary for the fulfillment of contractual and pre-contractual obligations. Providing personal data for the processing purposes indicated above is optional but necessary, as failure to provide such data will prevent users from using the services offered by the site.

2. **Direct marketing**

The data provided may, with the express and voluntary consent of the User, be used for marketing purposes. Communications may be made through the contact information provided by Users during registration (email, SMS, calls with or without an operator). When the Company sends promotional communications about third-party products, services, or events, it does not share your data with said third parties without your express consent. Consent to the use of personal data for this purpose is entirely optional, and refusal will not affect your participation in the initiative in any way. Furthermore, if consent is granted, Users may revoke it at any time by sending a request to the email address indicated in Section 8 of this policy.

**Legal basis:** user consent (Article 6, paragraph 1, letter a of the GDPR). The user may revoke consent at any time by sending an email to:[privacidad@nexthubdigital.com](mailto:privacidad@nexthubdigital.com) or in the case of sending emails through the automatic exit link in each shipment.

3. **Communication to third parties, independent data controllers, for their commercial purposes**

The data collected may be disclosed to third parties located in Switzerland, the European Union, and the United Kingdom for marketing and profiling purposes, only with the user's explicit consent (Article 6, paragraph 1, letter a, GDPR and UK GDPR).

With the express, free, and informed consent of users, the personal data provided during registration may be used by third parties to send commercial and promotional communications related to their products and services. These third parties will process your data as independent data controllers and may send promotional communications using the contact information provided by users during registration (email, SMS, or phone calls, with or without an operator). Consent to the use of your personal data for this purpose is entirely optional, and refusal will not in any way affect your ability to register and use the services offered on the site. Furthermore, if consent is granted, users may revoke it at any time by sending a request to the email address indicated in Section 8 of this policy.

## **Use of trademarks, communication of data to manufacturers and specific consent**

All names, trademarks, logos, and trade names mentioned on this Site are the exclusive property of their respective owners. Their use is for descriptive, informative, and comparative purposes only and does not imply any sponsorship, affiliation, or endorsement by the aforementioned brands.

Likewise, in certain cases, and provided that the User gives his or her prior, free, express and informed consent by checking the corresponding boxes ("checkboxes") on the Site's forms, the personal data provided may be communicated directly to the automobile manufacturers or other companies that own the aforementioned brands so that said entities may contact the User and send him or her commercial information, quotes, offers or proposals related to the vehicle or service of interest.

In the absence of such specific consent expressed by checking the corresponding box, no direct communication of the data will be made to the aforementioned companies.

**Legal basis:** user consent (art. 6 para. 1 letter a of the GDPR).

The updated list of third-party companies to which data may be disclosed is available upon request. To obtain an updated copy, please write to [privacidad@nexthubdigital.com](mailto:privacidad@nexthubdigital.com).

Third-party companies to which, with the User's free and optional consent, the Data Controller may communicate your personal data are classified into the following categories:

- i. Automobile and motor vehicle manufacturers
- ii. Car dealers (dealers and resellers)
- iii. Automotive-related products (accessories, spare parts, tires, etc.)
- iv. Car insurance
- v. Car financing and leasing
- vi. Car rental and shared mobility (car sharing, long-term rental, etc.)
- vii. Maintenance and repairs (workshops, body shops, inspection centers)
- viii. Electric mobility services (electric cars, charging stations, batteries, etc.)
- ix. Fleet management and business solutions
- x. Car technology and connectivity (GPS, infotainment, driver assistance software)
- xi. Car wash and detailing services
- xii. Sale of motorcycles and alternative vehicles (scooters, electric bicycles, campers, etc.)

These categories include third-party companies that have requested to be explicitly designated as Partners of the Data Controller.

#### **4. Profiling and automation**

The data provided may be used to analyze user preferences, habits, and behaviors using automated tools and advanced algorithms. This analysis allows the Data Controller to personalize promotional communications, tailoring content, offers, and messages to the user's specific interests.

*Purpose of profiling:*

The profiling activity aims to:

- Improve the user experience by offering personalized content and promotions.
- Offer targeted offers based on previous interactions with the Site and Services.
- Analyze purchasing behavior and propensity toward certain products or services.
- Segment users into interest categories for more effective marketing campaigns.
- Optimize customer relationships by providing more relevant support and services.

*Legal basis for processing*

Data processing for profiling is based on the user's explicit consent, in accordance with Article 6(1)(a) of the GDPR. Users have the right to refuse or withdraw their consent at any time, without affecting the lawfulness of the processing carried out prior to its withdrawal.

Users have the right to object at any time to profiling and the use of their data for direct marketing purposes, in accordance with Article 21 of the GDPR and the UK GDPR. To exercise this right, you can write to [privacidad@nexthubdigital.com](mailto:privacidad@nexthubdigital.com) or use the unsubscribe link in email and/or text message communications.

#### **4. TREATMENT METHODS**

The processing of the data collected for the purposes referred to in Article 3 above will be carried out using electronic or computer tools, paper media, and in all cases using methods strictly related to the purposes themselves, in order to guarantee the security and confidentiality of the data.

These methods will be relevant and not excessive with respect to the type of services provided.

## **5. SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA**

Users' personal data may be disclosed to the Data Controller's employees and/or collaborators in charge of managing the Site. These persons, formally designated by the Data Controller as "data processors," will process User data exclusively for the purposes indicated in this privacy policy and in accordance with applicable law.

If the Data Controller uses third-party providers for certain types of services, such as technological services, the User's data may also be communicated to these providers, who will process them as data controllers.

With the express consent of Users, Sponsors and third parties belonging to the categories indicated in Article 3.3 may process Users' personal data as Independent Data Controllers.

Except in the cases listed above, the User's data will not be transferred under any circumstances by the Data Controller.

## **6. DATA RETENTION PERIOD**

The data collected will be processed for the time strictly necessary to achieve the specific purposes for which the User has given their consent and, in all cases, in compliance with the terms established by current legislation.

- The data will be processed until consent is revoked and, in any case, will be retained for the time strictly necessary to protect the legitimate interests of NextHub Digital AG in accordance with the statute of limitations applicable in Switzerland, the European Union, and the United Kingdom (approximately 5 to 10 years, unless otherwise required by law).
- For the purposes set out in Articles 3.2 and 3.3, the data will be retained for a maximum of 24 months.
- In the event of litigation, data may be retained for longer periods to protect legal rights.

The data will then be anonymized or deleted, unless otherwise required by supervisory authorities, law enforcement agencies, or the judiciary.

If the User expresses their desire to no longer receive information and offers, the retention period will be interrupted and NextHub Digital AG will take appropriate technical and organizational measures to exclude any further contact with the User.

## 7. PLACE OF DATA PROCESSING AND TRANSFER OF DATA TO THIRD COUNTRIES

Data processing related to the web services of this Site is carried out at the Data Controller's headquarters in Switzerland (Zurich) and is managed exclusively by authorized personnel and by the Data Controllers.

The personal data collected may be transferred to and processed by entities located in the European Union, the United Kingdom, and Switzerland for purposes related to the provision of services, marketing, and the management of contractual relationships with partners and suppliers.

Data transfers between Switzerland and the UK are based on the UK-Switzerland Data Bridge, recognized by the UK ICO since 12 October 2023. For all other transfers outside the EEA, the European Commission's Standard Contractual Clauses (SCCs) or other safeguards compliant with the GDPR and UK GDPR apply.

In the case of transfers to countries without an adequacy decision from the European Commission or the UK ICO (e.g., the United States), such transfers will be carried out on the basis of the European Commission's Standard Contractual Clauses (SCCs), the UK's International Data Transfer Agreements (IDTAs), and, where necessary, additional technical and organizational measures will be implemented to ensure an adequate level of protection, as required by the EDPB (European Data Protection Board) guidelines.

These transfers will be carried out in accordance with Article 45 et seq. of the GDPR, which regulates the international transfer of personal data, with reference to the following legal bases:

- *European Commission adequacy decisions for Switzerland and the United Kingdom.*
- *Standard Contractual Clauses (SCCs) for data transfers between Switzerland, the EU and the UK.*
- *Other security measures that comply with the GDPR and UK GDPR*

For further information, the User may contact the Data Controller using the contact information provided in Article 8 of this Policy.

If you would like more information about the security measures we have adopted or to request a copy of the security measures we implement, you can contact us by email.

## 8. RIGHTS OF THE INTERESTED PARTY

The user may exercise the following rights:

- Access, rectification and deletion of personal data.
- Limitation and opposition to processing.
- Revocation of consent (without prejudice to the lawfulness of previous processing).
- Data portability in readable format.
- Complaint to the Italian Data Protection Authority.

The user may exercise these rights by contacting:

- by email to the address [privacidad@nexthubdigital.com](mailto:privacidad@nexthubdigital.com);
- by sending a registered letter with acknowledgment of receipt to the registered office of the data controller: NextHub Digital AG, Kreuzplatz 2, 8032 Zurich.
- **DPO**(Data Protection Officer): Attorney Claudia Chirico - Telephone: +390818633742  
**PEC:** [c.chirico@avvocatnocera-pec.it](mailto:c.chirico@avvocatnocera-pec.it)

In accordance with the Applicable Regulations, the Data Controller informs that Users have the right to obtain:

- i. the indication of the origin of the personal data;
- ii. the indication of the purposes and methods of the processing;
- iii. the indication of the logic applied in the case of processing carried out with the aid of electronic instruments;
- iv. the indication of the identifying data of the owner and the administrators;
- v. the indication of the subjects or categories of subjects to whom the personal data may be communicated or who may have knowledge of them in their capacity as data controllers or processors.

In addition, Users have the right to obtain:

- a. access, update, rectification or, where appropriate, integration of data;
- b. the deletion, transformation into anonymous form or blocking of data processed in violation of the law, including data whose retention is not necessary in relation to the purposes for which they were collected or subsequently processed;
- c. Certification that the operations referred to in letters a) and b) have been brought to the attention, including their content, of those to whom the data have been communicated or disseminated, except in the case where such



compliance proves impossible or involves the use of means that are manifestly disproportionate to the right protected.

In addition, Users have:

- a. the right to withdraw consent at any time, if the processing is based on your consent;
- b. the right to data portability (the right to receive all personal data concerning you in a structured, commonly used and machine-readable format), the right to restrict the processing of personal data and the right to erasure (the "right to be forgotten");
- c. the right to object: (i) in whole or in part, on legitimate grounds, to the processing of personal data concerning you, even if relevant to the purpose for which it was collected; (ii) in whole or in part, to the processing of personal data concerning you for the purpose of sending advertising or direct selling material or for the purpose of conducting market research or commercial communications; (iii) if the personal data are processed for direct marketing purposes, at any time, to the processing of your data carried out for such purposes, including profiling to the extent that it is related to such direct marketing;
- d. If you believe that the processing of your personal data infringes the Regulation, you have the right to lodge a complaint with a supervisory authority (in the Member State where you habitually reside, where you work, or where the alleged infringement occurred). The Data Controller is not responsible for updating the links that may appear in this Policy. Therefore, when a link does not work or is outdated, Users acknowledge and agree that they should always consult the document or section of the websites linked by said link.

Users have the right to lodge a complaint with the competent supervisory authority in the Member State of residence or in the country where the alleged infringement occurred.

The main reference authorities are:

- *Italian Data Protection Authority (Italy)* - [www.garanteprivacy.it](http://www.garanteprivacy.it)
- *National Commission on Information Technology and Civil Liberties (France)* - [www.cnil.fr](http://www.cnil.fr)
- *Spanish Data Protection Agency (Spagna)* - [www.aepd.es](http://www.aepd.es)
- *Information Commissioner's Office (UK)* - [www.ico.org.uk](http://www.ico.org.uk)

## **9. UPDATE AND MODIFICATION OF THE PRIVACY POLICY**

NextHub Digital AG reserves the right to modify this Privacy Policy at any time. Any changes will be posted on the Site, in the "Privacy Policy" section, highlighting the changes. Users are therefore advised to review this page periodically.

Any legal dispute will be subject to the jurisdiction of the Courts of Zurich, without prejudice to the right of the interested parties to appeal to the competent judicial authority in their country of residence, in accordance with applicable legislation (GDPR, nLPD, UK GDPR).