

# 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/Interested Parties.

This notice specifies the methods, purposes, and limits of data processing and is provided pursuant to Art. 13 of Regulation (EU) 2016/679 (hereinafter "GDPR"), the Swiss Federal Act on Data Protection (nLPD), and the United Kingdom General Data Protection Regulation (UK GDPR) to those who access the NextHub Digital AG website. Switzerland is recognized by the European Commission as a country with 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 via specific links.

Users are invited 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, with registered office in Via Giovan Battista Pioda 8, 6900 Lugano.

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**(Pursuant to Article 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, pursuant to Art. 28 of the GDPR, the Swiss Federal Act on Data Protection (nLPD), and the UK GDPR, can be requested by sending a written request to the Data Controller using the contact details indicated in Art. 8 of this Policy.

## 2. DATA COLLECTED

The personal data collected by the Data Controller during 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 provides the following personal data: full name, email address, telephone number, and postal code. The Data Controller may process this data for the service purposes referred to in Article 3, point 1, of this Policy.

**b. Browsing data:**

The computer/electronic systems and software procedures used to operate 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 functional to better manage and optimize the data transmission and email system. This data collection, carried out exclusively for statistical purposes or to monitor the proper functioning of the Site, is not intended to identify the User in any way. Web contact data is not retained after processing, except in the case of detecting cybercrime against the Site.

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

With your prior consent, you may receive communications via email, text message, or phone call.

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

The data provided is used to allow 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 in order to provide 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, i.e. 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 make it impossible for the user to use the services offered by the site.

## 2. **Direct marketing**

The data provided may, with the User's express and voluntary consent, be used for marketing purposes. Communications may be made using the contact information provided by the User during registration (email, SMS, or voice calls). When the Company sends promotional communications about third-party products, services, or events, it does not share your data with such third parties without your explicit consent. Consent to the use of personal data for this purpose is entirely optional, and refusal will in no way affect your participation in the initiative. Furthermore, once consent has been given, the User may withdraw 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:

[privacy@nexthubdigital.com](mailto:privacy@nexthubdigital.com) or in the case of sending emails via the automatic exit link present 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 relating 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 operator). Consent to the use of your personal data for this purpose is entirely optional, and any refusal will in no way affect the ability to register and use the services offered on the site. Furthermore, once consent has been given, 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 producers 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, informational, 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") in the Site's forms, the personal data provided may be communicated directly to the car manufacturers or other companies that own the aforementioned brands, so that these entities can contact the User and send him or her commercial information, quotes, offers, or proposals relating 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 to the aforementioned companies will be made.

**Legal basis:** user consent (Article 6, paragraph 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 [privacy@nexthubdigital.com](mailto:privacy@nexthubdigital.com).

The 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 also include third-party companies that have expressly requested to be 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 has the following objectives:

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

*Legal basis for processing*

Data processing for profiling is based on the user's explicit consent, pursuant to 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 processing based on consent before its withdrawal.

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

## **4. TREATMENT METHODS**

The processing of data collected for the purposes referred to in the previous Article 3 will be carried out using electronic or computerized tools, paper-based media, and in any case using methods strictly related to the purposes themselves, in order to guarantee the security and confidentiality of the data.

Such methods will be relevant and not excessive in relation 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 responsible for managing the Site. These individuals, formally designated by the Data Controller as "data processors," will process Users' data exclusively for the purposes indicated in this privacy policy and in compliance with applicable legislation.

If the Data Controller uses third-party providers for certain types of services, such as technology services, the User's data may also be disclosed 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 for the cases listed above, the User's data will under no circumstances be transferred 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 his or her consent and, in any case, 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 compliance with the applicable statutes of limitations in Switzerland, the European Union, and the United Kingdom (approximately 5-10 years, unless otherwise provided by law).
- For the purposes referred to 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 requested by the supervisory authorities, law enforcement agencies, or the judiciary.

If the User expresses the wish to no longer receive information and offers, the retention period will be terminated 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 DATA TRANSFER TO THIRD COUNTRIES

The processing operations connected to the web services of this Site take place at the Data Controller's headquarters in Switzerland (Zurich) and are handled 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, recognised 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 the UK GDPR apply.

For transfers to countries without an adequacy decision from the European Commission or the UK ICO (e.g., the United States), such transfers will be made 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.

Such 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 GDPR and UK GDPR compliant security measures*

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

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

## 8. RIGHTS OF THE INTERESTED PARTY

The user can exercise the following rights:

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

The user may exercise these rights by contacting:

- via email to the address [privacy@nexthubdigital.com](mailto:privacy@nexthubdigital.com);
- by sending a registered letter with acknowledgement of receipt to the registered office of the data controller: NextHub Digital AG, Kreuzplatz 2, 8032 Zurich.
- **Data Protection Officer**(Data Protection Officer): Attorney Claudia Chirico - Telephone: +39 081 8633742  
**PEC:**[c.chirico@avvocatinocera-pec.it](mailto:c.chirico@avvocatinocera-pec.it)

Pursuant to 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 case of processing carried out with the aid of electronic instruments;
- iv. the indication of the identifying details of the owner and the managers;
- v. the indication of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as data controllers or persons in charge of processing.

Furthermore, Users have the right to obtain:

- a. access, updating, rectification or, when interested, integration of the 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 the data 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 were communicated or disseminated, except where such compliance proves

impossible or involves the use of means manifestly disproportionate to the right being protected.

Furthermore, 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, for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of collection; (ii) in whole or in part, to the processing of personal data concerning you for the purpose of sending advertising or direct selling materials or for carrying out market research or commercial communications; (iii) if the personal data are processed for direct marketing purposes, at any time, to the processing of data concerning you 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 violates 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 Owner is not responsible for updating any links contained in this Policy. Therefore, if a link is not working or is out of date, Users acknowledge and agree to always consult the document or section of the websites connected via that link.

Users have the right to lodge a complaint with the competent supervisory authority in the Member State of their 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 for Information Technology and Civil Liberties (France)* -[www.cnil.fr](http://www.cnil.fr)
- *Spanish Data Protection Agency (Spain)* -[www.aepd.es](http://www.aepd.es)
- *Information Commissioner's Office (UK)* -[www.ico.org.uk](http://www.ico.org.uk)

## **9. UPDATING AND CHANGING 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 periodically review this page.

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