

Privacy Policy

The following privacy policy is provided by the Data Controller, NextHub Digital AG, with the purpose of describing the management methods of the website <https://cartogo-europe.com/> (hereinafter also referred to as the "Site") with specific reference to the processing of personal data provided by Users/Utilizers/Data Subjects.

This policy specifies the methods, purposes, and limits of the processing itself; it is provided pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter "GDPR"), the Swiss Federal Data Protection Act (nLPD), and the UK Data Protection Regulation (UK GDPR), to those who access the NextHub Digital AG Site. Switzerland is recognized by the European Commission as a country with an adequate level of data protection (Decision 2000/518/EC and subsequent updates).

This policy applies exclusively to <https://cartogo-europe.com/> and not to other websites or sections/pages/areas owned by third parties that the user may consult via specific links.

Users are invited to carefully read this Policy before providing any personal information and/or filling out any form/module available on the Site.

1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The data controller is NextHub Digital AG, with its registered office at Kreuzplatz 2, 8032 Zürich.

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

Data Protection Representatives

European Union (Pursuant to Article 27 GDPR)

Avv. Claudia Chirico

Via Nazionale 97, 84018 Scafati (Italy)

+39 081 8633742 | PEC: c.chirico@avvocatinocera-pec.it

The updated list of Data Processors, pursuant to Article 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 at the contact details indicated in Article 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 subscribe to the services offered on the website <https://cartogo-europe.com/>, they voluntarily provide the following personal data: full name, email address, phone number, and postal code. Such data may be processed by the Data Controller for the service purposes outlined in Article 3, point 1 of this Policy.

b. Browsing Data:

The computer/telecommunication systems and software procedures responsible for the proper functioning of the Site acquire, during their normal operation, certain personal data, the transmission of which is inherent in the use of web communication protocols or is useful for the better management and optimization of the data and email transmission system. This acquisition, which occurs solely for statistical purposes or to monitor the proper functioning of the Site, is in no way aimed at identifying the User. Web contact data is not retained after processing, except in cases of investigation of computer crimes against the Site.

c. Data for marketing and telemarketing purposes:

Subject to consent, the user may receive communications via email, SMS, or telephone calls.

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

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

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

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

The data provided by the User will be processed to provide the services offered by the Site and will allow the User to benefit from the Services.

The processing of personal data is based on Article 6, paragraph 2) of the GDPR, i.e., it is necessary for the performance of contractual and pre-contractual obligations. The provision of personal data for the processing purpose mentioned above is optional but necessary, as failure to provide it will prevent users from accessing the services offered by the Site.

2. Direct Marketing

The data provided may, upon the express and voluntary consent of the User, be used for marketing purposes. Communications may occur through the contact details provided by users during registration (email/SMS/calls with or without an operator). When the Company sends promotional communications regarding products, services, and/or events of third parties, it does not share your data with said third parties without your further specific consent. Consent to the use of personal data for this processing purpose is entirely optional, and any refusal will not in any way affect participation in the initiative. If consent is given, users may revoke it at any time by submitting a request to the email address indicated in Article 8 of this Policy.

Legal basis: user consent (Article 6, paragraph 1, letter a GDPR). The user may revoke consent at any time by sending an email to: privacy@nexthubdigital.com (privacy@nexthubdigital.com) or, in the case of email communications, via the automatic opt-out link included in each message.

3. Communication to Third Parties, Independent Data Controllers, for Their Marketing Purposes

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

Upon 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 regarding their own products and services. These third parties will process your data as independent data controllers and may send promotional communications via the contact details provided by users during registration (email/SMS/calls with or without an operator). Consent to the use of your personal data for this processing purpose is entirely optional, and any refusal will not in any way affect the ability to register and use the services offered on the Site. If consent is given, users may revoke it at any time by submitting a request to the email address indicated in Article 8 of this Policy.

Legal basis: user consent (Article 6, paragraph 1, letter a GDPR).

The updated list of third-party companies to which the data may be communicated is available upon request. To obtain an updated copy, write to privacy@nexthubdigital.com (<mailto:privacy@nexthubdigital.com>).

The third-party companies to which, with the user's free and optional consent, the User's personal data may be communicated by the Data Controller fall within the following categories:

- i. Manufacturers of cars and motor vehicles

- ii. Car dealers (dealerships and resellers)
- iii. Car-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. Technology and connectivity for cars (GPS, infotainment, assisted driving software)
- xi. Car washing and detailing services
- xii. Sale of motorcycles and alternative vehicles (scooters, electric bicycles, campers, etc.)

Within these categories are third-party companies that have requested to be explicitly listed as Partners of the Data Controller.

4. Profiling and Automation

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

Purpose of Profiling:

The profiling activity aims to:

- Enhance the user experience by offering personalized content and promotions.
- Propose targeted offers based on previous interactions with the Site and services.
- Analyze purchasing behaviors 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 of Processing

The processing of data for profiling purposes is based on the user's explicit consent,

pursuant to Article 6, paragraph 1, letter a of the GDPR. The user has the right to refuse or revoke consent at any time without prejudice to the lawfulness of the processing carried out before the revocation.

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 GDPR and UK GDPR. To exercise this right, you may write to privacy@nexthubdigital.com or use the unsubscribe link included in communications received via email and/or SMS.

4. METHODS OF PROCESSING

The processing of data collected for the purposes outlined in the previous Article 3 will be carried out using IT/telecommunication tools, paper supports, and, in any case, with methods strictly related to the purposes themselves, in order to ensure 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 DATA COMMUNICATION AND DISSEMINATION

The User's personal data may come to the attention of employees and/or collaborators of the Data Controller tasked with managing the Site. These individuals, formally appointed by the Data Controller as "data processors," will process the User's data solely for the purposes indicated in this Policy and in compliance with applicable regulations.

If the Data Controller uses external suppliers for certain types of services, such as technological services, the User's data may also be communicated to these suppliers, who will process it as data processors.

Upon the express consent of Users, the User's personal data may also be processed by Sponsors and third parties belonging to the categories listed in Article 3.3 as Independent Data Controllers.

Except for the cases listed above, the User's data will not be disseminated by the Data Controller in any way.

6. DATA RETENTION PERIOD

The data collected will be processed for the time strictly necessary to pursue the specific purposes for which the User has given consent and, in any case, in compliance with the terms provided by applicable regulations.

- The data will be processed until any revocation of consent and, in any case, retained for the time strictly necessary to protect the legitimate interests of NextHub Digital AG in accordance with the applicable limitation periods in Switzerland, the European Union, and the United Kingdom (approximately between 5 and 10 years, unless otherwise required by law).

- For the purposes outlined in Articles 3.2 and 3.3, the data will be retained for a maximum of 24 months.
- In the event of legal disputes, the data may be retained for longer periods to protect a right in judicial proceedings.

Subsequently, the data will be anonymized or deleted, unless otherwise instructed by supervisory authorities, law enforcement, or the judiciary.

If the User expresses a desire not to receive further information and offers, the retention period will be interrupted, and NextHub Digital AG will adopt appropriate technical and organizational measures to prevent further contact with the User.

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

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

The personal data collected may be transferred 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.

The transfer of data between Switzerland and the United Kingdom is based on the UK-Switzerland Data Bridge, recognized by the UK ICO as of October 12, 2023. For all other transfers outside the EEA, the Standard Contractual Clauses (SCC) of the European Commission or other security measures compliant with the GDPR and UK GDPR are applied.

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 occur based on the European Commission's Standard Contractual Clauses (SCC), the UK's International Data Transfer Agreement (IDTA), and, where necessary, additional technical and organizational measures will be applied to ensure an adequate level of protection, as required by the EDPB (European Data Protection Board) guidelines.

Such transfers will comply with Article 45 et seq. of the GDPR, which governs the international transfer of personal data, relying on the following legal bases:

- *Adequacy decisions of the European Commission for Switzerland and the United Kingdom.*

- *Standard Contractual Clauses (SCC) for data transfers between Switzerland, the EU, and the UK.*
- *Other security measures compliant with the GDPR and UK GDPR.*
For further information, the User may contact the Data Controller using the contact details provided in Article 8 of this Policy.

If you wish to obtain more information about the security measures adopted or request a copy of the safeguards applied, you can contact us via email.

8. DATA SUBJECT'S RIGHTS

The user may exercise the following rights:

- Access, rectification, and deletion of personal data.
- Restriction and objection to processing.
- Revocation of consent (without prejudice to the lawfulness of prior processing).
- Data portability in a readable format.
- Filing a complaint with the Data Protection Authority.

The user may exercise these rights by directly contacting:

- Via an email message to privacy@nexthubdigital.com;
- By sending a registered letter with return receipt to the Data Controller's registered office: NextHub Digital AG, Kreuzplatz 2, 8032 Zürich.
DPO (Data Protection Officer): Avv. Claudia Chirico - Telephone: +390818633742
PEC: c.chirico@avvocatinocera-pec.it (<mailto:c.chirico@avvocatinocera-pec.it>)

Pursuant to applicable regulations, the Data Controller informs Users that they have the right to obtain:

- i. Indication of the origin of personal data;
- ii. Indication of the purposes and methods of processing;
- iii. Indication of the logic applied in case of processing carried out with the aid of electronic tools;
- iv. Indication of the identification details of the data controller and processors;
- v. Indication of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it as processors or persons in charge.

Furthermore, Users have the right to obtain:

- a. Access, updating, rectification, or, where applicable, integration of data;
- b. Deletion, anonymization, or blocking of data processed in violation of the law, including data whose retention is unnecessary for the purposes for which it was collected or subsequently processed;
- c. Certification that the operations referred to in points a) and b) have been brought to the attention, including their content, of those to whom the data was communicated or disseminated, except where such fulfillment proves impossible or involves a manifestly disproportionate effort compared to the right being protected.

Moreover, Users have:

- a. The right to revoke consent at any time, where the processing is based on their consent;
- b. The right to data portability (the right to receive all personal data concerning them in a structured, commonly used, and machine-readable format), the right to restrict the processing of personal data, and the right to erasure ("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 them, even if relevant to the purpose of collection; ii) in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising material or direct sales or for conducting market research or commercial communication; iii) where personal data is processed for direct marketing purposes, at any time, to the processing of their data for such purposes, including profiling insofar as it is related to such direct marketing;
- d. If they believe that the processing concerning them violates the Regulation, the right to lodge a complaint with a supervisory authority (in the Member State where they habitually reside, work, or where the alleged violation occurred). The Data Controller is not responsible for updating any links displayed in this Policy; therefore, whenever a link is not functioning and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites referenced by such link.

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

The main reference authorities are:

- *Garante per la protezione dei dati personali (Italy)* - www.garanteprivacy.it
- *Commission Nationale de l'Informatique et des Libertés (France)* - www.cnil.fr
- *Agencia Española de Protección de Datos (Spain)* - www.aepd.es
- *Information Commissioner's Office (United Kingdom)* - www.ico.org.uk

9. UPDATES AND AMENDMENTS TO THE PRIVACY POLICY

NextHub Digital AG reserves the right to amend this Privacy Policy at any time. Amendments will be published on the Site in the "Privacy Policy" section, with evidence of the changes made. Users are therefore invited to periodically consult this page.

Any legal disputes will fall under the jurisdiction of the Zurich Court, without prejudice to the rights of data subjects to take action before the competent Judicial Authority in their State of residence, in accordance with applicable regulations (GDPR, nLPD, UK GDPR).