

<b>INFOVIAS Mobile Application Privacy Policy</b>
<b>1. Scope</b>
This privacy policy is intended to provide you with information on the processing of personal data in connection with the download and use of the <b>INFOVIAS</b> mobile application
<b>2. Personal Data</b>
Personal data in accordance with the General Data Protection Regulation (hereinafter ' <b>GDPR</b> ') means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
<b>3. Processing of personal data when downloading and using INFOVIAS</b>
No registration or login are required to download and use <b>INFOVIAS</b> and no user identification or contact details are required.  <b>INFOVIAS</b> only collects the unique identifier of the device on which it is downloaded and used for the purpose of sending/receiving notifications on traffic congestion/occurrences on the road, as explained in the following paragraph ( <b>Information and Notifications</b> ).
<b>4. Information and Notifications on the InfoVias App</b>
At <b>INFOVIAS</b> the user will have access to maps, recommendations and multiple information regarding the Madeira Island's roadways (hereinafter " <b>Routes</b> ") provided by the <i>Secretaria Regional dos Equipamentos e Infraestruturas</i> of the Autonomous Region of Madeira, the Route concessionaires VIALITORAL and VIAEXPRESSO, as well as information provided by the police force.  Additionally, <b>INFOVIAS</b> sends notifications to the user's mobile device regarding traffic congestion/occurrences on the Routes or other information regarding traffic or the condition of the Routes. For this purpose, <b>INFOVIAS</b> collects and processes information corresponding to the unique identifier of the device, as well as information about the selections that the user has indicated, at any given time, on <b>INFOVIAS</b> for managing the notifications the user wishes to receive regarding traffic congestion/occurrences on the Routes.  The receipt of notifications can be freely managed by the user at any time in the "Preferences" tab of <b>INFOVIAS</b> and notifications can be enabled and disabled at any time in the same tab by the user on the mobile device.
<b>5. Identification and contact details of the Data Controller</b>
The data controller, meaning, the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data, is the <i>Região Autónoma da Madeira</i> (Autonomous Region of Madeira), through the <i>Secretaria Regional dos Equipamentos e Infraestruturas da Região Autónoma da Madeira</i> (Regional Secretariat for

Equipment and Infrastructure of the Autonomous Region of Madeira), through the *Direção Regional de Estradas (DRE)* (Regional Directorate of Roads). The DRE is the department responsible for the planning, maintenance and operation of the regional road network of the Autonomous Region of Madeira and its contacts are indicated below:

Address: Rua Dr. Pestana Júnior, nº 6, 9064-506 Funchal

Phone: (+351) 291207200; Fax (+351) 291207249; E-mail: [srei@madeira.gov.pt](mailto:srei@madeira.gov.pt)

The contact details of the Data Protection Officer appointed by the RAM are as follows:

- António Gil Fraga Gomes Ferreira

- Email: [antoniogil.ferreira@madeira.gov.pt](mailto:antoniogil.ferreira@madeira.gov.pt) / [dre.srei@madeira.gov.pt](mailto:dre.srei@madeira.gov.pt)

- Phone: (+351) 291 207 272 / Fax: (+351) 291 225 688

## **6. Purposes and grounds for data processing. Storage of data**

The data are processed exclusively to provide the functionalities of **INFOVIAS** and, in particular, to enable the service to be provided (sending notifications to the user's mobile device concerning traffic congestion/occurrences on the Routes or other information relating to the activity or conditions of the Routes), based on Article 6(1)(b) of the GDPR.

Personal data processed for the provision and use of **INFOVIAS** will be retained for as long as the user maintains **INFOVIAS** installed.

## **7. Assistance**

In case of breakdown or accident on the **ROUTES, INFOVIAS**, through the SOS option available for this purpose, allows the user to establish a direct free phone contact for assistance from the concessionaries (**VIALITORAL** or **VIAEXPRESSO**), through their respective toll free numbers.

If the user has the location option activated on their mobile phone, **INFOVIAS** will display their coordinates in the "Assistance" tab, allowing them, if they so wish, to inform the assistance service contacted, of their location for assistance to be provided by the concessionaire, at the location of the Route where they are. This information will remain in the device, and neither the RAM nor the concessionaire will have direct access to the information in the device.

The transmission of geo-location data for this service can be activated and deactivated at any time in the settings of both the App and the mobile device, so that such data will only be processed with the users consent, provided through geo-location activation.

The above data will only be processed for the purposes of facilitating the requested assistance service (Article 6(1)(b) of the GDPR).

## **8. Data backup and recovery**

The collected device identifier and the stored data are backed up by a data backup on the **INFOVIAS** server and stored for recovery purposes.

#### **9. Use of processors**

For the purpose of sending notifications made available by **INFOVIAS** to the user, the unique identifier of the equipment and the user selections, activated at each moment in time on the Preferences tab, are processed by service providers contracted for the provision of the solution and *push notification* service available from **INFOVIAS** (data processors).

#### **10. Data subject rights**

You may exercise the following rights vis-à-vis the controller at any time through the contact details provided above and free of charge

**Rights of information and access to personal data:** You have the right to be informed by the controller on how, by whom, for what purposes and on which basis your personal data is processed and you have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access the personal data provide a copy of the personal data undergoing processing.

**Right of rectification:** You have the right to request the rectification of any personal data concerning you which is inaccurate or incomplete.

**Right of erasure:** You have the right to request the erasure of your data if any of the conditions set out in Article 17 of the GDPR are met. You may then request, for example, the erasure of your data, provided that the purpose for which they were collected is no longer necessary.

**Right to restriction of processing:** You have the right to request the restriction of the processing of your data if the conditions of Article 18 of the GDPR are met. This is the case, for example, if you contest the accuracy of your data. You may request that the processing be limited for the time necessary to examine the accuracy of your data.

**Right to object:** On grounds relating to your particular situation which are of overriding interest if the conditions of Article 21 of the GDPR are met.

**Right to data portability:** If data processing is based on consent or is necessary for the performance of a contractual obligation and the processing is carried out by automated means, you have the right to receive your data in a structured, commonly used and machine-readable format, and to transfer it to another data controller.

**Right to withdraw consent:** If data processing is based (only) on consent, you have the right to withdraw your consent at any time with effect for the future and without giving reasons for your choice.

**Right to lodge a complaint:** You have the right to lodge a complaint with the personal data protection supervisory authority, which in Portugal is the Comissão Nacional de Proteção de Dados ([www.cnpd.pt](http://www.cnpd.pt)), about the way your data is handled.

#### **11. Contact person: Data Protection Officer**

The Data Protection Officer referred to in paragraph 5 shall be your contact person for all data protection related issues and shall be available to assist you in exercising your rights.

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