

According to the art. 13 of the European Regulation 2016/679 (hereinafter the "**GDPR**") the following information is provided on the processing put in place by ADR Tel S.p.A., in the context of calls to the airport information centers (065151).

1. DATA CONTROLLER

The data controller is ADR Tel S.p.A. with registered office in via Pier Paolo Racchetti, 1 - 00054 Fiumicino, Rome (hereinafter the "**Data Controller**" or "**ADR Tel**").

2. TYPES OF DATA PROCESSED

The data processed by the Data Controller may include personal data and contact data (e.g. e-mail address and phone number).

In order to manage your request, the Data Controller may also have the need to process personal data of third parties. In this case you undertake to inform these subjects of the treatments carried out as indicated below, also by providing them with this information.

3. PURPOSE OF THE PROCESSING AND CONSEQUENCES IN THE EVENT OF FAILURE TO PROVIDE DATA.

The personal data you provided are processed by the Data Controller in the context of providing the Call Center service, in relation to the management of interventions on information systems, in order to:

- a) satisfy your request formulated through the indicated channel;
- b) after registration of the call, according to the procedures indicated in paragraph 5 below, to guarantee and improve the quality of the service;
- c) fulfill any legal obligations to which the Data Controller may be subject to.

For the purposes referred to in points a) and c) the provision of your personal data is necessary and any failure to provide it will not allow the Owner to provide the requested service.

Otherwise, the provision of your personal data for the purposes referred to in point b) is optional. You can exercise your right to object by communicating directly to the operator during the call.

4. LEGAL BASIS OF THE TREATMENT

The processing of data referred to in paragraph 3, lett. a), it is carried out to fulfill your request; therefore, the legal basis of the processing is constituted by the execution of contractual and pre-contractual measures referred to in Article 6, c.1, lett. b), GDPR also with reference to the contract between your company with Adr Tel.

The processing of your personal data for the purposes referred to in paragraph 3, lett. b) is carried out on the legitimate interest of the Data Controller, according to the logics disclosed within this information, pursuant to Article 6, paragraph 1, lett. f), GDPR.

Otherwise, the legal basis of the treatment referred to in paragraph 3, lett. c) is constituted by the fulfillment of a legal obligation in accordance with Article 6, c. 1, lett. c), GDPR.

5. METHOD OF TREATMENT

The data is processed in compliance with the regulations in force by means of manual, IT and telematic tools, with logics strictly connected to the indicated purposes, in order to guarantee the security and confidentiality of the data.

Calls will be recorded and a sample of the recordings can be analyzed, using automated tools, in order to guarantee and improve the quality of the service rendered. The Data Controller adopts the appropriate

technical and organizational requirements aimed at making this treatment compliant with the relevant legislative and regulatory requirements.

6. DATA STORAGE TIMES

Your personal data will be processed exclusively for the time necessary to satisfy your request. Subsequently, they can be stored in a manner that guarantees confidentiality, in accordance with the provisions of the current regulations regarding the limitation period.

With specific reference to the recording of calls for the purposes referred to in paragraph 3 above, these may be kept for a period not exceeding 6 months.

7. RECIPIENTS OF DATA

For the pursuit of the aforementioned purposes, your personal data will be known by the employees and collaborators of the Data Controller, who will operate as authorized processing data.

Furthermore, the Data Controller may need to communicate your personal data to third parties and, in particular:

- Global Remote Services S.r.l., appointed for this purpose as data controller, as company in charge of call center services;
- Authenticity.ai Corporation, which carries out the analysis of calls recorded for the improvement of the services rendered for ADR Tel.

In fulfilling any legal obligations, your data may also be communicated by the Data Controller to the competent Public Authorities, who would act as (independent) data controllers.

In no case will your personal data be disseminated.

8. LOCATION OF THE CALL CENTER

With reference to the "New regulatory provisions on call center activities Article 1, c. 243, of Law no. 232 of 2016" ADR Tel informs you to use, for all the call center services of an operator, services located in Romania.

9. RIGHTS OF INTERESTED PARTIES

Finally, we inform you that the articles 15-22, GDPR, confer on the interested parties the possibility of exercising specific rights. In particular, the interested party may obtain from the Data Controller: access, rectification, cancellation, limitation of processing, revocation of consent and portability of data concerning himself.

Furthermore, the interested party has the right to oppose the processing of data subject of this information at any time. In the event that the right of opposition is exercised, the Data Controller reserves the right not to proceed with the request, and therefore to continue processing, only if there were legitimate cogent reasons for proceeding with the processing that prevail over interests, rights and freedom of the interested party.

In particular, with reference to the automated processing performed to analyze the sample of records for the purpose of evaluating the quality of the service, you can object by communicating it directly to the operator during the call.

The above rights may be exercised with an informal request to the Data Protection Officer (DPO) at the following address dpo@adr.it. The contact details of the Data Protection Officer are available on www.adr.it.