

ADR – Information notice totem contact center

INFORMATION NOTICE

Pursuant to article 13, Regulation (EU) 2016/679 (“GDPR”)

By means of this information notice, Aeroporti di Roma S.p.A. wishes to inform you about the purposes for which it collects and processes your personal data, which categories of data are processed, which are your rights as data subject and how they can be exercised.

1. DATA CONTROLLER

Aeroporti di Roma S.p.A., with registered office in via Pier Paolo Racchetti, 1 – 00054 Fiumicino, in person of the legal representative for the time being (“**ADR**” or the “**Data Controller**”).

2. DATA PROTECTION OFFICER

The Data Controller appointed a data protection officer (“**Data Protection Officer**” or “**DPO**”). The DPO can be contacted by email at dpo@adr.it, or by writing to:

Data Protection Officer:
c/o Aeroporti di Roma S.p.A.
Via Pier Paolo Racchetti, 1
00054 – Fiumicino

3. DEFINITION OF PERSONAL DATA

Under the GDPR, personal data is defined as: *“any information relating to an identified or identifiable natural person; 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”* (“**Data**”).

4. PURPOSE AND LEGAL BASIS OF THE PROCESSING ACTIVITIES

The Data Controller, in the context of the phone call made by means of the totems, in order to receive information regarding airport services, may process the following Data:

- personal data (e.g., name, surname);
- contact data (e.g., home address, telephone number, email address);
- in general, any other data and information necessary to fulfil your assistance request.

In particular, your Data may be processed by ADR for the following purposes:

a) Provide you with the requested information about airport services

The legal basis for the processing of your Data in order to fulfil your requests is represented by art. 6, par. 1, letter b), GDPR, i.e., the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

The provision of your Data for the aforementioned purpose is voluntary. However, in the event you refuse to provide the Data, it would not be possible for the Data Controller to provide you with required assistance.

b) Improving the quality of the call center service



In order to guarantee and improve the quality of the call center service, ADR, may record the phone calls you may direct to ADR's phone assistance. The processing of your Data for this purpose is carried out on the basis of the legitimate interest of the Data Controller pursuant to art. 6, par.1, letter f), GDPR.

The provision of your Data for such purpose is voluntary and you may object to the processing of your Data by notifying the operator directly during the call or by terminating the communication, in which case the processing will be interrupted immediately and, in any case, by objecting in writing pursuant to par. 7 of this information notice.

In any event, the Data Controller is committed to ensure that the information collected and processed is appropriate for the purposes as described above, and that this does not involve an invasion of your privacy.

5. COMMUNICATION OF DATA TO THIRD PARTIES

ADR may communicate your Data to third parties it engages for the performance of organisational and/or technical support activities, such as AdR Tel S.p.A. which is in charge of the call center service.

These subjects have been specifically appointed by the Data Controller as Data Processors pursuant to art. 28, GDPR, and have received specific instructions from the Data Controller in order to ensure compliance with the GDPR.

The list of Data Processors up to date can be requested by writing to dpo@adr.it or to the following address: Via Pier Paolo Racchetti, 1 00054 Fiumicino (RM).

In addition the Data Controller may communicate your Data to subjects to whom disclosure is required by law. These entities will carry out their respective processing activities as independent data controllers.

In any case, your data will not be disseminated.

6. APPLICABLE RETENTION PERIOD

The Data Controller will process your Data for the time strictly necessary to achieve the purposes indicated and described in paragraph 2.

Subsequently, the Data may be stored in a way that guarantees confidentiality for the applicable retention period provided by the law.

With specific reference to the recordings of calls for the purposes set forth in paragraph 4, letter b) above, Data may be stored for no longer than 6 months from the time of the phone call and/or your assistance requests has been handled by the Data Controller.

7. YOUR RIGHTS AS DATA SUBJECT

At any point, while the Data Controller is in possession of or processes your Data, you, the data subject, have the following rights:

- Right of access – you have the right to obtain confirmation as to whether or not your personal data is being processed, and, where that is the case, the right to access to the personal data and to receive any information regarding the processing activities;
- Right of rectification – you have the right to obtain without undue delay the rectification of your personal data, should it be inaccurate or incomplete;
- Right to erasure – in certain circumstances, you have the right to obtain the erasure of your personal data from our records;
- Right to restriction on processing – provided that certain conditions apply, you have the right to obtain restriction of the processing of your personal data;
- Right of portability – you have the right to have your personal data we hold transmitted to another data controller;



- Right to revoke consent - should it be applicable, you have the right to revoke your consent to the processing of your Data at any time, without prejudice to the lawfulness of the processing based on consent prior to revocation;
- Right to object – you have the right to object to the processing of your personal data;
- Right to lodge a complaint before the Supervisory authority – should the Data Controller refuse to follow up to your request to exercise your rights as provided for by the GDPR, the Data Controller shall provide you with the reason underpinning said refusal. If need be, you have the right to lodge a complaint as set forth under paragraph 8 below.

The above rights may be exercised against the Data Controller by writing to the contacts indicated in paragraph 1 or by contacting the DPO at the addresses indicated in paragraph 2 above.

The exercise of your rights as data subject is free of charge pursuant to and within the limits of Article 12, GDPR.

8. COMPLAINTS

Should you wish to file a motion as to how your Data is being processed by the Data controller, or as to how your complaint has been handled, you have the right to lodge a complaint directly before the Supervisory authority.