

**Policy on the processing of personal data related to the
Book a Table service
pursuant to Articles 13 - 14 of the European Regulation 2016/679 ("GDPR")**

Dear user,

pursuant to Articles 13 and 14 of the European Regulation 2016/679 ("GDPR"), **Aeroporti di Roma S.p.A.**, in its capacity as data controller, (hereinafter "ADR" or the "Data Controller"), hereby issues the following information on the processing of your personal data as part of the "Book a Table" service made available to passengers in order to allow them to reserve seats in the dining areas at participating restaurants ("Restaurant(s)") at Fiumicino Leonardo da Vinci International Airport (hereinafter, the "Airport").

The "Book a Table" service is hereinafter also referred to as the "Service".

ADR informs you that this privacy policy concerns exclusively the management by ADR of online reservations for the Airport Restaurants made on the "OpenTable System". This policy does not apply to other websites owned by third parties or to processing activities carried out by third parties (i.e. OpenTable, Inc. and other companies in the same group) where they act as autonomous data controllers. Please, we invite you to read the privacy policies of these third parties with regard to their processing of personal data. ADR shall not be held liable for any violations of personal data caused by OpenTable in its capacity as data controller and/or for any case of non-compliance by OpenTable in its capacity as data controller with the applicable legislation on personal data, including the provisions on the transfer of personal data to third countries as set out in Chapter V of Regulation (EU) 2016/679.

In this regard, as specified in paragraph 7 below, your personal data shall be disclosed by ADR to Autogrill Italia S.p.A., manager of the Restaurants, in order to allow it to manage your reservation and eventual table assignment (pursuant to Art. 6(b) of the GDPR. Personal data shall be made available to the selected restaurant in the manner and for the purposes specified in this privacy policy.

1. DATA CONTROLLER

Aeroporti di Roma S.p.A. with registered office in via Pier Paolo Racchetti 1 - 00054 Fiumicino (Rome).

2. DATA PROTECTION OFFICER

ADR has appointed a Data Protection Officer ("DPO"), pursuant to Article 37 of the GDPR, who can be contacted at the following e-mail address: dpo@adr.it.

3. TYPES OF DATA PROCESSED

Your personal data processed by ADR are collected directly from you in relation to your reservation request at the Airport Restaurant entered by you on the "OpenTable System" in one of the following alternative ways:

- via the online widget on romeairports.com;
- by filling in the online form on the OpenTable website.

ADR processes the following types of personal data (hereinafter jointly referred to as 'Personal Data'):

- **Personal and contact details:** name, surname, e-mail, phone number;
- **Reservation data:** Restaurant, Occasion (birthday, business lunch, etc.) → Optional; Special request → Optional.

If you provide Personal Data on behalf of someone else, you must ensure, in advance, that they have read this Privacy Policy. We kindly ask that you help us keep your personal data up-to-date by informing us of any changes.

Please do not include "Special categories of data" (so-called sensitive data) in your requests to ADR, i.e. data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data or data concerning health, sex life or sexual orientation. If you do so, we will erase this information. In particular, we ask that you to not enter information on food preferences (e.g. allergies, celiac disease, etc.).

4. PURPOSE AND LEGAL BASIS OF PROCESSING

ADR processes your Personal Data for one or more of the following purposes, in consideration of the legal basis indicated from time to time.

1) Managing of the 'Book a Table' service

Your Personal Data will be processed by ADR to fulfil your request to activate the Service and to communicate your Personal Data to the selected Restaurant.

The legal basis for the processing is the performance of a contract to which you are a party or the performance of pre-contractual measures taken at your request pursuant to Article 6(b) of the GDPR.

The provision of Personal Data is necessary to use the "Book a Table" Service, and refusal to provide them will make it impossible to use the Service.

2) Marketing

With your prior consent, ADR will process your Personal Data to send you commercial and promotional information (newsletters), surveys regarding discounts, promotions, Airport news and institutional events.

Marketing communications will be sent via automated contact methods (e-mail).

The legal basis for the processing is your consent pursuant to Article 6(a) of the GDPR.

The provision of Personal Data for this purpose is optional; if you do not consent to the processing, you may use the Service without prejudice, but you will not receive commercial and promotional communications from ADR. You may withdraw your consent (*opt-out*) at any time via the specific link provided in the e-mail communications you receive, as well as by means of the procedures set out in section 9 below.

3) Purposes relating to the obligations established by national laws, regulations or European law, by provisions/requests of authorities empowered to do so by law and/or by supervisory and control bodies

ADR will process your Personal Data to comply with its legal obligations.

The legal basis for the processing is the compliance with a legal obligation, pursuant to Article 6(c) of the GDPR.

The provision of your Personal Data for these purposes is mandatory, as failure to do so will make it impossible for the Data Controller to comply with specific legal obligations.

4) **Purposes related to the prevention of fraud committed through the use of the Service, as well as for the defence of rights in the course of judicial, administrative or extrajudicial proceedings, and in the context of disputes arising in connection with the Service.**

ADR will process your Personal Data to prevent and/or detect any fraudulent activities or abuses in the use of the Service and to defend its rights or make claims against you or third parties.

The legal basis for the processing is the legitimate interest of the Data Controller to protect its rights and to prevent and/or detect any fraudulent activities or abuses in the use of the Service pursuant to Article 6(f) of the GDPR.

In this case, you are not required to provide any new and specific Personal Data since the Data Controller will pursue this additional purpose, where necessary, by processing the Personal Data collected for the above-mentioned purposes, which are deemed compatible with this purpose (also by reason of the context in which the Personal Data were collected, the relationship between you and ADR, the nature of the Data and the appropriate guarantees for their processing, as well as the link between the above-mentioned purposes and this additional purpose).

5. PROCESSING METHODS

Personal Data are processed in compliance with the regulations in force by means of computerised and telematic tools, with logic strictly related to the purposes indicated, so as to guarantee the security and confidentiality of the data.

Your Personal Data are stored exclusively on the OpenTable System and are accessible and usable according to our standards and security policies (or equivalent standards for our suppliers or business partners).

6. DATA RETENTION PERIOD

In accordance with the principle of minimisation and limitation under Article 5.1(c) and (e) of the GDPR, your Personal Data will only be stored for as long as necessary to pursue the purposes for which they were collected or for any other legitimate related purpose. Therefore, if the data are processed for two different purposes, we will keep those data until the purpose with the longer term ends. However, we will no longer process Personal Data for the purpose whose retention period has expired.

Personal Data that are no longer needed, or for which there is no longer a legal basis for their storage, are irreversibly anonymised (and thus can be stored) or securely destroyed.

Personal Data processed to fulfil contractual obligations will be kept for the time necessary to fulfil your request for activation of the Service and for the subsequent applicable statutory period.

Personal Data processed for the purpose of sending commercial and promotional communications, as referred to in purpose no. 2, will be retained until consent is withdrawn (*opt-out*) in the manner set out in section 9 below. In any case, we will periodically ask you to confirm your consent for this purpose in order to respect your choice.

With particular reference to requests from authorities or the compliance with legal obligations, or in the event of judicial protection of our rights, your Personal Data will be stored for the time necessary to comply with such obligations or fulfilments or to pursue the protection of our rights.

7. RECIPIENTS OF PERSONAL DATA

Within ADR, the Personal Data you have provided shall be disclosed only to those persons entrusted with the processing by the Data Controller and authorised to carry out processing operations as part of the aforementioned activities.

Furthermore, your Personal Data will be processed by Autogrill Italia S.p.A. - appointed by ADR as data processor pursuant to Art. 28, GDPR – for the managing of the reservation and potential table assignment.

Your Personal Data may be processed by OpenTable Inc. which acts as data processor pursuant to Art. 28, GDPR in relation to the sole management on the "System" of reservations at the Restaurants and as autonomous data controller pursuant to Articles 4 and 24 GDPR in relation to further and different processing activities connected to the provision of the Service, of which it defines the purposes.

You can contact ADR at dpo@adr.it to ask to see the list of data processors and other entities to which it discloses your Personal Data.

Your Personal Data may be disclosed to the competent Public Authorities in compliance with legal obligations.

In any event, your Personal Data will not be disseminated.

8. DATA TRANSFER OUTSIDE OF THE EEA

Your Personal Data will be processed by ADR within the European Economic Area (EEA).

However, the use of the OpenTable System may entail, albeit on a residual basis, the transfer of Personal Data to parties established in countries that do not belong to the European Union (EU) or the EEA (hereinafter referred to as "Third Countries"). This transfer is in any case carried out in compliance with Chapter V of the GDPR.

As regards to third parties who will process Personal Data in their capacity as autonomous data controllers or as data processors, they will be duly appointed by the Data Controller in accordance with data protection legislation (depending on their role in relation to the processing).

You can contact ADR at dpo@adr.it to ask to which entities your Personal Data are transferred and to receive a copy of the safeguards adopted for the transfer.

9. RIGHTS OF THE DATA SUBJECT

Finally, we hereby inform you that you have the right to request from ADR, subject to the existence of the legal prerequisite underlying your request:

- a) access to Personal Data, as provided for in Article 15 of the GDPR;
- b) rectification or completion of Personal Data held by ADR that are considered inaccurate, as provided for in Article 16 of the GDPR;
- c) the erasure of Personal Data for which ADR no longer has any legal prerequisite for processing, as provided for in Article 17 of the GDPR;
- d) the restriction of the manner in which personal data are processed, if one of the cases provided for in Article 18 of the GDPR applies;
- e) a copy of the Personal Data provided to ADR, in a structured, commonly used and machine-readable format and the transmission of such data to another data controller (data portability), as provided for in Article 20 of the GDPR.

Right to object: in addition to the rights listed above, you have the right to object at any time, on grounds relating to your particular situation, to the processing of your Personal Data carried out in pursuit of ADR's legitimate interest and to the processing carried out for marketing purposes. In the event that the right to object is exercised, the Data Controller reserves the right not to comply with the request, and thus to continue processing, if there are compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject.

With regard to the processing for marketing activities, you may at any time withdraw your consent to the receiving of commercial and promotional communications via the link provided at the bottom of received e-mails (*opt-out*) or, as for all the rights referred to above, by sending an informal request to the DPO at the following address: dpo@adr.it.

All of the above is without prejudice to your right to file a complaint with the Italian Data Protection Authority pursuant to Article 77 of the GDPR, using the references available on the website www.garanteprivacy.it, or to take appropriate legal action.

The Data Controller reserves the right to update this privacy policy.

Date of last update

August 2023