

## Registration with the CartaFreccia Programme Personal Data Protection Policy

Art. 13 of European Regulation No. 679/2016

Before acquiring the personal data required for your registration with the CartaFreccia Programme, Trenitalia invites you to carefully read the policy regarding personal data protection.

### I. Data Controller and Data Protection Officer

Below are our main contact persons in relation to the processing of personal data:

- **Data Controller:** Trenitalia, represented by the Chief Executive Officer *pro-tempore*, with registered office in Piazza della Croce Rossa 1 – 00161 – Rome, can be contacted at: [titolaretrattamento@trenitalia.it](mailto:titolaretrattamento@trenitalia.it),
- **Data Protection Officer:** Trenitalia's *Data Protection Officer* (DPO) can be contacted at the following email address: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).

### II. Types of personal data

The personal data being processed fall into the following categories:

- **Data acquired directly from the data subject during the registration process for the CartaFreccia Programme (mandatory):** Name, surname, tax code (place and date of birth, gender), email, mobile number, home address, username
- **Data acquired directly from the data subject in the Customer Area (optional):** Landline phone number, educational qualification, profession, number of family members, number of children, travel habits or preferences (frequency of travel, preferred class/service, most used train, most frequent route, main reason for travel), preferred purchasing channel, type of services you wish to sign up for such as, for example, participation in online surveys or questionnaires, setting-up "My Favourite Journey", Season ticket expiration alert, etc.
- **Automatically acquired data:** data relating to the journey undertaken (train tickets, services purchased).

The aforementioned data will be processed using electronic and paper-based formats in order to guarantee suitable measures of security and privacy.

### III. Purpose of Data Processing

Your personal data will be processed for the following purposes:

- Provision of Loyalty Card and sending your CartaFreccia Silver, Gold or Platinum Card to your home address; Nature of provision of data: *Mandatory*; Legal base: *Contractual*
- Provision of services connected to the CartaFreccia Programme (e.g. accumulation of points, booking confirmation and seat number in case of purchase, customer recognition at *call centres*, etc.); Nature of provision of data: *Mandatory*; Legal basis: *Contractual*.
- Promotional and *marketing* activities by Trenitalia: Nature of provision of data: *Optional*. Legal basis: *Consent granted during the registration process for the CartaFreccia Programme or in the Customer Area*
- Profiling activities by Trenitalia: Nature of provision of data: *Optional*. Legal basis: *Consent granted during the registration process for the CartaFreccia Programme or in the Customer Area*

Provision of the data necessary to carry out the purposes referred to in points a) and b) is "*mandatory*" and any refusal would make it impossible for Trenitalia to issue the Loyalty Card and to provide the services related to the CartaFreccia Programme. Provision of the data necessary to carry out the purposes referred to in point c) is "*optional*"; therefore, non-provision will not lead to restrictions on the services provided, but will result in the registered user not receiving any informational, advertising and promotional material or surveys on customer satisfaction. Provision of the data necessary to carry out the purposes referred to in point d) is "*optional*"; therefore, non-provision will not lead to restrictions on the services provided, but it will not allow Trenitalia to identify your travel habits and consumer choices in order to offer services that are in line with your personal preferences.

Any consent given with regard to the purposes outlined in b) and c) may be freely withdrawn at any time, without prejudice to the lawfulness of the processing of data carried out before its withdrawal. Consent can be withdrawn by contacting the following email address: [daticartafreccia@trenitalia.it](mailto:daticartafreccia@trenitalia.it), or by contacting the

**Data Protection Officer** at: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).

### IV. Persons authorised to process personal data

Your personal data will only be made accessible to **persons who have been authorised to process data** within Trenitalia. These individuals will be properly instructed in order to avoid the loss of your personal data, to prevent unauthorised parties from accessing your data or from carrying out unauthorised processing of the data itself. Furthermore, your data may be processed by companies that carry out activities on behalf of Trenitalia, including **IT services companies, mailing services companies, companies responsible for the distribution of rewards and loyalty services**. These companies shall act as **Data Processors** on behalf of Trenitalia and they have signed a specific contract that precisely regulates the processing of data entrusted to them and the obligations regarding data protection; your data will never be disclosed to third parties. Lastly, your personal data may be transmitted to other **independent data controllers** in accordance with applicable laws or regulations (Judicial authorities, Law enforcement authorities).

An updated list of persons and companies who are authorised to process data is available by contacting the email address: [daticartafreccia@trenitalia.it](mailto:daticartafreccia@trenitalia.it), or by contacting the **Data Protection Officer** at: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).

#### **V. Retention of personal data**

Below are the retention times for your personal data:

- *For the purposes outlined above and listed as “mandatory” in nature, as per point III. a) and III. b) of this Policy: after 10 years of user inactivity (non-access to the Customer Area, no purchases, no associated service requests, with the exception of the cancellation requests, etc.)*
- *For the purposes outlined above and listed as “optional” in nature, as per points III. c) and III. d): data relating to specific details of purchases shall be kept for *marketing* or profiling purposes for a period not exceeding 24 and 12 months, respectively, from their initial date of registration, except for a possible claim for the anonymisation of the aforementioned data.*

#### **VI. Rights of data subjects**

EU Regulation 2016/679 (Articles 15 to 23) grants data subjects the option to exercise specific rights. In particular, in relation to the processing of your personal data, you have the right to ask Trenitalia for access, rectification, deletion, limitation, opposition and portability of your personal data. In addition, you may lodge a complaint with the Supervisory Authority, which, in Italy, is the Data Protection Authority.

You may request to exercise your rights from Trenitalia at any time by contacting the following email address: [daticartafreccia@trenitalia.it](mailto:daticartafreccia@trenitalia.it), or by contacting the **Data Protection Officer** at: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).

#### **VII. Automated decision-making process and profiling**

Trenitalia uses profiling to detect the travel habits and consumer choices of its users, in order to provide services that are in line with customer preferences. This process of profiling involves the analysis of your travel habits in the last 12 months (favourite destinations, average distance travelled, monthly costs incurred, etc.) and it may also entail behavioural advertising and personalised offers.

However, it is possible to oppose such data processing, through the channels outlined in Section VI of this Policy.