

# CARTAFRECCIA Programme Personal Data Protection Policy

Articles 13 and 14 of European Regulation No. 679/2016

Before acquiring the personal data necessary for your registration with the Rewards 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, with registered office in Piazza della Croce Rossa 1 – 00161 – Rome, Italy, represented by the pro-tempore Chief Executive Officer, 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 sign-up process for the Rewards Programme (mandatory): Name, surname, tax code (place and date of birth, gender), email address, mobile phone number, home address, username.
- Data acquired directly from the data subject in the Customer Area (optional): Landline phone number, educational qualifications, 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).
- Data collected during the management of the Rewards Programme (optional): Data collected in relation to behaviour, lifestyle or consumption habits; profiling data; opinion polls.

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:

- a. Provision of Loyalty Card and sending your CartaFreccia Silver, Gold or Platinum Card to your home address; Nature of the provision: Mandatory; Legal basis: Contractual;
- b. Provision of services connected to the Rewards Programme (e.g. accumulation of points, booking confirmation and seat number in case of purchase, customer recognition at call centres, etc.); Nature of the provision: Mandatory; Legal basis: Contractual;
- c. Registration on the website [www.trenitalia.com](http://www.trenitalia.com) to grant access to and use of the Customer Area on the website and the Trenitalia app, which allows members to take advantage of certain benefits, such as faster purchasing of your favourite journeys, viewing your purchase history, easily managing your purchased tickets (e.g. for compensation claims), saving your travelling companions or saving an invoice profile with a specific tax code so you can quickly retrieve this information when you make your next purchase); Nature of the provision: Mandatory; Legal basis: Contractual;
- d. Promotional and marketing activities by Trenitalia relating to services offered by Trenitalia or its Partners; Nature of the provision: Optional; Legal basis: Consent granted during the sign-up process for the Rewards Programme or in the Customer Area;
- e. Profiling activities by Trenitalia; Nature of the provision: Optional; Legal basis: Consent granted during the sign-up process for the Rewards Programme or in the Customer Area;
- f. The transfer of data to Trenitalia France S.A.S to facilitate promotional and marketing activities by Trenitalia France relating to services offered by Trenitalia France or its Partners from France; Nature of the provision: Optional; Legal basis: Consent granted during the sign-up process for the Rewards Programme or in the Customer Area.

The provision of the data necessary to pursue the purposes referred to in points a), b) and c) is “mandatory” in nature, and refusal to do so will make it impossible for Trenitalia to issue the Loyalty Card, to provide the services related to the Rewards Programme and to permit registration on the Trenitalia website: [www.trenitalia.com](http://www.trenitalia.com). The provision of the data necessary to pursue the purpose referred to in point d) is “optional” in nature; therefore, a refusal to provide them 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 customer satisfaction surveys by Trenitalia relating to services offered by Trenitalia or its Partners.

The provision of the data necessary to pursue the purpose referred to in point e) is “optional” in nature; therefore, refusal to provide such data will not lead to restrictions on the services provided, but it will prevent Trenitalia from identifying your travel habits and consumer choices for the purpose of offering services that are in line with your personal preferences.

The provision of the data necessary to pursue the purpose referred to in point f) is “optional” in nature; therefore, refusal to provide such data will not lead to restrictions on the services provided, but it will prevent Trenitalia from transferring your data to Trenitalia France for the purposes of sending you informational, advertising and promotional material relating to services that Trenitalia France or its Partners offer from France.

If you have already signed up as a registered user on the [www.trenitalia.com](http://www.trenitalia.com) website or if you are already a member of a different Trenitalia loyalty programme, the consent you have given during the sign-up process for the Rewards Programme or the Customer Area shall replace any consent you have already granted.

Any consent given with regard to the purposes outlined in d), e) and f) 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 accessing your Customer Area on the website: [www.trenitalia.com](http://www.trenitalia.com) (in the “Modify details” section), by writing to the following email address: [datcartafreccia@trenitalia.it](mailto:datcartafreccia@trenitalia.it), or by contacting the Data Protection Officer at the following email address: [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 and to prevent unauthorised parties from accessing the 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 service companies, mailing service companies, companies responsible for the distribution of rewards and loyalty services, or catering and caring services. These companies act as Data Processors on behalf of Trenitalia, and have signed a specific contract that duly regulates the processing entrusted to them and their obligations regarding data protection. Your data will never be disseminated.

Finally, your personal data may be transmitted to other independent data controllers in accordance with applicable laws or regulations (Judicial authorities, Law enforcement authorities). Only if you have granted your consent may your data be transmitted to Trenitalia France in order for it to send you informational, advertising and promotional material relating to the services provided by Trenitalia France or other Partners from France. The Trenitalia France policy can be viewed on the website: [www.trenitalia.com/trenitalia-france.html](http://www.trenitalia.com/trenitalia-france.html) .

The up-to-date list of the persons and companies who are authorised to process data is available by contacting the email address: [datcartafreccia@trenitalia.it](mailto:datcartafreccia@trenitalia.it), or by contacting the Data Protection Officer at: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).

#### V. Personal data storage

Below are the storage times for your personal data by Trenitalia:

- For the purposes outlined in points III. a), III. b) and III. c) of this policy, which make the provision of data mandatory: For a period of 10 years after customer inactivity (lack of purchases and/or accumulation of points under the Rewards Programme and subsequent renewals).
- For the purposes outlined in points III. d) and III. e), which make the provision of data optional: data relating to the specific details of purchases shall be stored for marketing or profiling purposes for a period not exceeding 24 and 12 months, respectively, from their initial date of registration, unless they are rendered anonymous.

#### VI. Rights of the 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 to or the rectification, erasure, limitation or portability of your personal data, or to object to processing. In addition, you may lodge a complaint with the Supervisory Authority which, in Italy, is the Data Protection Authority.

You may ask to exercise your rights in relation to Trenitalia S.p.A. at any time, by contacting the email address: [datcartafreccia@trenitalia.it](mailto:datcartafreccia@trenitalia.it), or by contacting the Data Protection Officer at the email address: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).

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

Trenitalia uses profiling to identify 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 the present Policy.