

Management of travel provided free of charge on Intercity, Eurocity and Regional trains for Ukrainian citizens coming from Ukraine and subjects coming from Ukraine to allow them to reach their first place of destination or reception within 5 days of their arrival in Italy (Decreets no. 873, dated 06/03/2022, and no. 876, dated 13/03/2022 of the Presidency of the Council of Ministers, Civil Protection Department).

Personal Data Protection Policy

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

Before processing the personal data necessary to provide travel free of charge on Intercity, Eurocity and Regional trains for Ukrainian citizens coming from Ukraine and subjects coming from Ukraine to allow them to reach their first place of destination or reception within 5 days of their arrival in Italy (Decreets no. 873, dated 06/03/2022, and no. 876, dated 13/03/2022 of the Presidency of the Council of Ministers, Civil Protection Department), Trenitalia kindly asks 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 the following email address: titolaretrattamento@trenitalia.it
- **Data Protection Officer:** Trenitalia's *Data Protection Officer* (DPO) can be contacted at the following email address: protezionedati@trenitalia.it

II. Types of personal data

The personal data being processed fall into the following categories:

- **Data collected directly from the data subject (mandatory):** Name, Surname, Details of document used as form of personal identification, date of arrival in Italian territory.

Additional data processed (this does not apply to minors whose age excludes them from the vaccine campaign – up to 12 years of age – nor to those who are exempt on the basis of a valid medical certificate):

- **Special data acquired directly from the data subject during the ticket inspection phase:** specific data required to disclose health status (results of SARS-COV 2 swab test)
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

I Your personal data will be processed for the following purposes:

- a. Management of travel provided free of charge on Intercity, Eurocity and Regional train in compliance with Decreets no. 873, dated 06/03/2022, and no. 876, dated 13/03/2022 of the Presidency of the Council of Ministers, Civil Protection Department: Nature of the provision: *Mandatory*. Legal basis: *Legal obligation*;
- b. To check the result of SARS-COV 2 swab test. Nature of the provision: *Mandatory*. Legal basis: *Legal obligation*

II Provision of the data necessary for the purposes referred to in point a) and b) is “*mandatory*” and any refusal could make it impossible for Trenitalia to permit travel free of charge.

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 acting as **Data Processors**, including **IT services companies**, and **Railway Services Companies for night trains**. These companies have signed a specific contract that precisely regulates the processing of the data entrusted to them and their obligations regarding data protection. Lastly, your personal data may be transmitted to other **independent data controllers** in accordance with applicable laws or regulations (Judicial authorities, Law enforcement authorities).

Your personal data may be processed by persons or parties indicated in Article 5 of the Decree no. 876, dated 13/03/2022 of the Presidency of the Council of Ministers, Civil Protection Department.

The updated list of persons and parties authorised to process data is available by contacting the **Data Protection Officer** at the following email address: protezionedati@trenitalia.it.

V. Retention of personal data

Data acquired directly from the data subject: (Name, Surname, Details of document used as form of personal identification, date of arrival in Italian territory) shall be retained until the state of emergency ends.

The data relating to the results of the SARS-COV 2 swab test are only subject to consultation by designated personnel.

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 at any time by contacting the **Data Protection Officer** at the following email address: protezionedati@trenitalia.it.