

(Pursuant to Art. 13 of European Regulation No. 679/2016)

Before acquiring your personal data for registration with the CARTAFRECCIA Programme, Trenitalia S.p.A. asks you to carefully read the policy regarding personal data protection.

I. Data Controller and DPO

In this section we indicate our contact persons

- Data Controller: Trenitalia S.p.A., represented by the Chief Executive Officer, pro-tempore, can be contacted at titolaretrattamento@trenitalia.it with registered office in Piazza della Croce Rossa 1, 00161 Rome.
- DPO: Data Protection Officer (DPO): protezionedati@trenitalia.it.

II. Types of personal data

In this section we indicate the types of data we request

- Data acquired directly from the data subject:
 - o Mandatory:
Data necessary for registration with the service, such as: first and last name, e-mail address, telephone number, place and date of birth, residence, gender, tax code; account details.
 - o Optional:
Educational qualification, profession, information on family members, travel habits or preferences, preferred purchase channels, types of service to sign up for such as, for example, participation in online surveys or questionnaires, any promotions or invitations that can be activated.

The aforementioned data will be processed using computer and paper media in order to guarantee suitable measures of security and privacy.

III. Purpose of Data Processing

In this section, we indicate the purpose for processing your data

- a. Provision of services connected to the CARTAFRECCIA Programme (e.g. points credited, confirmation of booking and seat in case of purchase, customer recognition at call centre); Provision of personal data Mandatory; Legal basis Contractual
- b. Provision of Loyalty Card; Provision of personal data Mandatory; Legal basis Contractual
- c. Trenitalia S.p.A. promotional and marketing activities; Provision of personal data Optional; Legal basis Consent
- d. Trenitalia S.p.A. profiling activities; Provision of personal data Optional; Legal basis Consent

Provision of the data necessary for the purposes referred to in points a) and b) is "mandatory" and any refusal would make it impossible for Trenitalia S.p.A. to provide the services related to the CARTAFRECCIA Programme and to provide the Loyalty Card.

Provision of the data necessary for the purposes referred to in point c) is "optional", therefore non-provision will not lead to restrictions on the services provided but will not allow you to take part in further competitions and prize events nor to receive advertising material.

Provision of the data necessary for the purposes referred to in point d) is "optional", therefore non-provision will not lead to restrictions on the services provided but will not allow Trenitalia S.p.A. to identify your travel habits and consumer choices in order to offer services in line with your preferences

Any consent given may be freely withdrawn at any time, without prejudice to the lawfulness of the processing carried out before withdrawal. Consent can be withdrawn by contacting the Data Manager at daticartafreccia@trenitalia.it, or by contacting the Data Protection Officer at protezionedati@trenitalia.it

IV. Data recipients

In this section we indicate who will process your data and to whom they will be communicated
For pursuit of the aforementioned purposes, personal data will be processed by the following parties:

- Parties attributable to Trenitalia S.p.A.:
 - o Trenitalia employees authorised for processing;
 - o Computer services companies
 - o Mailing services companies
 - o Companies providing reward and loyalty services

- Parties non directly attributable to Trenitalia S.p.A.:
 - o Judicial authorities
 - o Police authorities

Your data will only be processed by parties expressly authorised by Trenitalia S.p.A. or by companies acting as Data Processors, on behalf of Trenitalia S.p.A., and who have signed a specific contract that specifically regulates the processing entrusted to them and the obligations regarding data protection; your data, will never be disseminated.

The updated list of the data recipients is available by contacting the Data Manager at dati@trenitalia.it, or by contacting the Data Protection Officer at the e-mail address: protezionedati@trenitalia.it.

V. Data retention

In this section we indicate how long we will store your data

The personal data that you have provided to us will be retained for:

- Purposes for which data provision is mandatory: the entire duration of the CARTAFRECCIA Programme
- Purposes for which data provision is optional: 24 months from provision of consent for the purposes referred to in point c); 12 months from provision of consent for the purposes referred to in point d).

VI. Rights of the data subjects

In this section we indicate the rights we guarantee

EU Regulation 2016/679 (Articles 15 to 23) grants data subjects the exercise of specific rights. In particular, in relation to the processing of your personal data, you have the right to ask Trenitalia S.p.A. for access, rectification, deletion, limitation, opposition and portability. In addition, you may lodge a complaint to 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 Manager at dati@trenitalia.it, or by contacting the Data Protection Officer at protezionedati@trenitalia.it.

VII. Automated decision-making process and profiling

In this section, we indicate whether the data processing calls for automated decisions or profiling and the related impacts

Trenitalia S.p.A. uses your personal data for profiling processes in order to identify your travel habits and consumer choices, with the aim to offer services in line with your preferences, without prejudice to the possibility of objecting to the processing of data through the channels referred to in Section VI of this policy.

The logic used for your profiling envisages an analysis of travel habits (preferred destinations, average distance, monthly costs sustained, etc.).

Profiling involves behavioural advertising and customised offers.