Conciliation

Personal Data Protection Policy

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

Before acquiring your personal data for a request for conciliation, Trenitalia S.p.A. invites you to carefully read the personal data protection policy.

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

- **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:

- **Generic data**: personal details, tax code, copy of ID, contact details, economic-financial data, bank details, credit card number, credit card transactions.

- **Special categories of data**: choice of Consumer Association, state of health, membership of protected categories.

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) To manage the Conciliation file; Nature of data provision (Mandatory); Legal basis (Contractual)

b) To process certain conciliation procedures, the processing of special categories of personal data (“sensitive data”) may be necessary; Nature of data provision (Optional); Legal basis (Consent)

c) To improve conciliation request management in the case of communication difficulties and/or to speed up response times; Nature of data provision (Optional); Legal basis (Consent)

The provision of the data necessary to pursue the purpose referred to in point a) is “mandatory” in nature, and refusal to do so could make it impossible for Trenitalia S.p.A. to process the conciliation request. The provision of the data necessary to pursue the purpose referred to in point b) is “optional” in nature, and refusal to do so could make it impossible for Trenitalia S.p.A. to use the special categories of personal data in order to correctly process your conciliation request, which may, in some cases, result in the inadmissibility of the submitted request. The provision of the data necessary to pursue the purpose referred to in point c) is “optional” in nature. Therefore, failure to provide them will only make it impossible to improve the management of the claim and/or to speed up response times. Any consent given may be freely withdrawn at any time, without prejudice to the lawfulness of the processing of data carried out prior to withdrawal. Withdrawal of consent can be communicated by contacting the Data Protection Officer at the following email address: 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 your data or from carrying out unauthorised processing on the data. In addition, your data may be processed by companies that carry out activities on behalf of Trenitalia as Data Processors, including IT services companies and other FS Italiane Group companies. Lastly, your personal data may be transmitted to other independent data controllers in order to process the conciliation request or to comply with legal obligations or regulations (consumers’ associations, mediators from those associations, the Joint Conciliation Commission, Ministry of Economic Development, Invitalia).
The up-to-date list of data recipients is available by contacting the Data Protection Officer at the following email address: protezionedati@trenitalia.it

V. Personal data storage
The personal data that you have provided us with will be stored for:
  • Purposes which make the provision of data mandatory (point a): 10 years from the outcome of the conciliation procedure
  • Purposes which make the provision of data optional (point b): 10 years from the outcome of the conciliation procedure
  • Purposes which make the provision of data optional (point c): 24 months from the acquisition of the data.
Exceptions are made in the case of extended storage for the following purposes: archiving in the public interest, scientific or historical research, statistical purposes or for technical reasons (e.g. operational continuity).

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

Consent
Should it be necessary for Trenitalia S.p.A. to acquire special categories of my personal data (“sensitive data”) in order to process the conciliation request, including but not limited to my choice of Consumer Association, state of health, or membership of protected categories, I consent to the processing of my sensitive (so-called “special”) data by Trenitalia S.p.A.

□ I consent □ I do not consent

I consent to the use of my email address and/or telephone number for the purpose of improving the management of my conciliation request in case of communication difficulties and/or to speed up response times.

□ I consent □ I do not consent

Date………………………………..
Signature…………………………………….