

Search for and return items that have been lost on a train Personal Data Protection Policy

(Pursuant to Articles 13 and 14 of European Regulation No. 679/2016)

Before acquiring the personal data required to search for and return items that have been lost on a train, 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., with registered office in Piazza della Croce Rossa 1, Rome, Italy, represented by the *pro-tempore* Chief Executive Officer, can be contacted at: titolaretrattamento@trenitalia.it.
- **DPO:** Contact details for the *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:**

Customary data: personal data (name, surname, residential address), contact details (email address, telephone numbers), travel data (ticket ID), identity document details.

- **In the case of delegation: the customary data of the delegate who shall collect the lost object:** personal data (name and surname), delegation document and details of the delegate's personal identity document.

Customary data of the delegating party: personal data (name, surname, residential address), contact details (email address, telephone numbers), travel data (ticket ID), identity document details.

- **Data acquired automatically while browsing the website in the event of a request submitted via webform:** to ensure the correct functioning of the website, computer systems are used that automatically acquire certain information, which is directly connected to the use of computer protocols, to maintain proper operation of the system. This information may include, for example: IP address, type of browser used, ISP, operating system, domain name and addresses of websites from which you accessed or exited (referring/exit pages) the site, information on pages visited within the website, access times, time spent on a single webpage, internal path analysis, etc.

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

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

- a) Management of the search and return of items lost on board trains; Nature of the provision of personal data (*Mandatory*); Legal basis (*Contractual*)
Provision of the data necessary to carry out the purposes referred to in point a) is "*mandatory*" and any refusal could make it impossible for Trenitalia S.p.A. to process the request to search for/recover lost items.

IV. Data recipients

In this section, we indicate who will process your data and to whom your data will be communicated.

In order to pursue the aforementioned purpose, your personal data will be processed by the following parties:

Parties attributable to Trenitalia S.p.A.:

- Consultants, external professionals and companies that manage the contact centre service
- Employees
- Lost property storage and return company

Parties not directly attributable to Trenitalia S.p.A.:

- Lost property management company (as an independent owner)
- Judicial authorities
- Law enforcement 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 duly regulates the processing entrusted to them and their obligations regarding data protection. Your data will never be disseminated.

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. Data retention

In this section, we indicate the length of time your data will be stored.

The personal data that has been provided to us by the data subject for the purposes referred to in paragraph III above will be stored for 12 months from the closure of the case file, except for the need to comply with a specific request from the judicial authority.

VI. Rights of Data Subjects *In this section we indicate which rights you are guaranteed*

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 request from Trenitalia S.p.A. the following:

- Access: you may request confirmation as to whether or not data concerning you is being processed, as well as further clarifications regarding the information referred to in this policy;
- Rectification: you may request to rectify or add to the data you have provided us, if it is inaccurate or incomplete;
- Deletion: you may request that your data be deleted if they are no longer necessary for our purposes, in the event of revocation of consent or opposition to personal data processing, in the event of unlawful processing, or should a legal obligation for deletion arise;
- Limitation: you may request that your data be processed only for the purposes of data retention, with the exclusion of other processing, for the period necessary to rectify your data, in the event of unlawful processing for which you oppose deletion, if you are required to exercise your rights in court and the data stored by us may be useful to you and, finally, in the event of opposition to data processing and pending the verification of the prevalence of our legitimate reasons over yours.
- Objection: you may object at any time to the processing of your data, unless there are legitimate reasons for us to proceed with processing which prevail over yours, for example to conduct our operations or mount a defence in court.
- Portability: you may request to receive your data, or have it transferred to another data controller as stipulated by you, in a structured format, which is commonly used and readable by an automatic device.

Furthermore, we would like to inform you that if you believe that your rights have been violated, you have the right to lodge a complaint with the Supervisory Authority, which in Italy is the Personal Data Protection Authority.

You may ask to exercise your rights in relation to Trenitalia S.p.A. at any time by contacting the Data Protection Officer at the email address: protezionedati@trenitalia.it.