

**Call Centre Service**  
**Personal Data Protection Policy**  
**(Pursuant to Articles 13 and 14 of European Regulation No. 679/2016)**

Before acquiring your personal data to grant access to our Call Centre Services, Trenitalia S.p.A. invites you to carefully read the personal data protection policy.

**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 00161, Rome, Italy, represented by the *pro-tempore* Chief Executive Officer, can be contacted at: [titolaretrattamento@trenitalia.it](mailto:titolaretrattamento@trenitalia.it).
  
- **DPO:** Contact details for the *Data Protection Officer (DPO)*: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).

**Types of personal data**

*In this section, we indicate the types of data we request*

**Data acquired from the data subject in order to manage access to the call centre:** Personal data (Name, Surname), Contact details (email, telephone contacts), Cartafreccia/ XGO number for customers who have signed up to the loyalty programme, Multimedia data (audio).

In order to obtain specific services (e.g. purchase of personal, non-transferable tickets; refund requests, etc.), additional data may be processed in accordance with the specific personal data protection policy relating to the service in question, which you are invited to consult at [www.trenitalia.com](http://www.trenitalia.com).

The above data will be processed using electronic tools in order to guarantee suitable measures of security and privacy.

**Purpose of Data Processing**

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

- a. Managing access to purchase requests; booking changes; refunds; requests for assistance; points transfer for Cartafreccia customers; Nature of provision (Mandatory); Legal basis (Contractual);
- b. Satisfaction survey; Nature of the provision (Optional); Legal basis (Consent);
- c. to improve service quality (recording of audio on calls); Provision of data (Optional); Legal basis (Consent).

The provision of the data necessary to pursue the purposes referred to in point a) is “*mandatory*” in nature, and refusal to do so could make it impossible for Trenitalia S.p.A. to provide the assistance requested.

The provision of the data necessary to pursue the purpose referred to in point b) is “*optional*” in nature; therefore, failure to provide such data, which should be stated directly to the operator, will not lead to restrictions on the services provided, but will prevent Trenitalia S.p.A. from measuring your satisfaction level for the purpose of offering services that meet your expectations.

The provision of the data necessary to pursue the purpose referred to in point c) 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 making audio recordings for quality control purposes.

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. Consent can be withdrawn by contacting the Data Manager at the email address: [csvd@trenitalia.it](mailto:csvd@trenitalia.it), or by contacting the **Data Protection Officer** at the email address: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it).

### **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 purposes, your personal data will be processed by the following parties:

#### **Parties attributable to Trenitalia S.p.A.:**

- Persons authorised to process data (Trenitalia S.p.A. employees)
- Services companies (including IT services)
- the Call Centre Management Company

#### **Parties non directly attributable to Trenitalia S.p.A.:**

- 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 Manager at the email address: [csvd@trenitalia.it](mailto:csvd@trenitalia.it); or by contacting the **Data Protection Officer** at the email address: [protezionedati@trenitalia.it](mailto:protezionedati@trenitalia.it)

### **Data retention**

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

The personal data that you have provided us with will be stored for:

For the purposes outlined in point III. a) of this policy, which make the provision of data mandatory: 4 years from the date the refund procedure was completed;

For the purposes outlined in point III. b) of this policy, which make the provision of data optional: 8 months from the date the data was acquired;

For the purposes outlined in point III. c) of this policy, which make the provision of data optional: 90 days from the date the audio recording was acquired.

Please note that the storage time for your personal data for the purposes referred to above as “mandatory” in nature refer to the management of access to call centre services; personal data provided in order to obtain specific services (e.g. purchase of personal, non-transferable tickets; refund requests, etc.) are processed and stored in accordance with the specific personal data protection policy relating to the service in question, which you are invited to consult at [www.trenitalia.com](http://www.trenitalia.com).

### **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 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 Data Protection Authority.

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