

CONCILIATION PROCESS MANAGEMENT Personal Data Protection Policy

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

Before acquiring the personal data required to manage your conciliation request, 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.

- The **Data Controller** is Trenitalia S.p.A., with registered office in Piazza della Croce Rossa 1, Rome, Italy, represented by the pro-tempore Chief Executive Officer, and can be contacted at: titolaretrattamento@trenitalia.it.
- The **Data Protection Officer** can be contacted at the following email address: protezionedati@trenitalia.it.



II. Types of personal data

In this section, we indicate the types of data we collect.

The personal data being processed fall into the following categories:

Mandatory customary data: personal details, residential address, tax code, copy of identity document, contact details (email), economic and financial data, bank details, credit card number, credit card transactions, details present in the complaint attached to the conciliation request, journey details and data pertaining to regional train tickets: ticket number/Ticket ID; for tickets relating to other trains: PNR, train number .

Optional customary data: contact details (telephone and/or fax number) and home address.

Special categories of data: Based on the specific characteristics of the request for conciliation that has been submitted, Trenitalia may become aware of personal data that falls under the "special" category (e.g. choice of Consumer Association, state of health, belonging to protected categories). Due to the fact that such data has been manifestly and freely made available to Trenitalia, the claimant or user is not required to give explicit consent for the handling and processing of the complaint in question. Trenitalia would like to assure the claimant or user that such data will be processed exclusively for purposes strictly related and instrumental to the handling and processing of the complaint itself; in the absence of such personal data, Trenitalia will partially or wholly be unable to follow up your request.

For conciliation requests sent via web form – Data acquired automatically while browsing the website: 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 the 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 why we collect your data

Personal data will be processed for the following **purposes**:

- a. Management of the Conciliation process; Provision of data (Mandatory); Legal base (Contractual);
- b. 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).

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 conciliation request. Provision of the data necessary to carry out the purposes referred to in point b) is "optional"; therefore, failure to provide the aforementioned data will solely result in making it impossible for Trenitalia to improve its management and processing of the conciliation request and/or to speed up its 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. Data recipients

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

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 the personal data and to prevent unauthorised parties from accessing the 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 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, Ministries, 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. Dissemination of data

In this section, we guarantee that your data will not be disseminated

Your personal data will never be published, displayed or made available/consultable to unspecified parties.



VI. Data retention

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

Personal data that has been provided to us by the data subject will be stored for 10 years from the date the conciliation procedure was completed.



VII. 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** in relation to Trenitalia S.p.A. at any time by contacting the **Data Protection Officer** at the email address: protezionedati@trenitalia.it.

Declaration of consent

For the processing of personal data indicated in Paragraph III. section b) - "Purpose of Data Processing"):
I consent to the use of my telephone number for the purpose of improving the management and processing of my conciliation request in case of communication difficulties and/or to speed up response times.

I consent

I do not consent

Date _____ Signature _____