

Purchase of Train Tickets and/or Non-Transferable Products Groups Office Personal Data Protection Policy

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

Before acquiring your personal data, which is required to carry out the purchase of train tickets and/or non-transferable products, Trenitalia 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 In the event of the purchase, via Trenitalia's ticketing platform, of Trenitalia services in combination with services from other partners, or of tickets or non-transferable products that fall under the sole responsibility of other partners, the aforementioned partners may assume the following alternative roles:
 - **Joint Data Controllers** for the purposes of issuing and verifying the validity of the ticket, or for the sole purpose of verifying the validity of the ticket.
 - **Data Controllers** for the purpose of issuing and managing the ticket and/or the non-transferable product. In this case, Trenitalia represents the Data Processor.

The list of partners is available at the following link: [Partner.pdf](#). Policy information and contact details for each of these partners are available on their respective institutional websites. For the sale of tickets for the Milan-Paris route, Trenitalia and Trenitalia France assume the following role:

- Joint Data Controllers for the purposes of issuing, managing and verifying the validity of the ticket.

II. Types of personal data

The personal data being processed fall into the following categories:

Passenger/buyer data acquired during the purchasing process for a non-transferable product and/or ticket (mandatory): name, surname, date of birth, email address, mobile phone number¹ and payment information. Additional data acquired for the purchase of carnets: CartaFreccia and X-GO number. Additional data acquired for the Trenitalia Pass: personal details present on the identity document. Additional data acquired for the purchase of a Pegaso monthly/annual season ticket: tax code.

Additional data acquired for Eurail/Interrail: sex, place of birth. Additional data acquired for the purchase of a ticket issued in conjunction with a non-transferable document granting a discount: number of the non-transferable discount document (for example: Carta Verde number, Carta Argento number). Additional data acquired for the purchase of a non-transferable product and/or ticket, in the event that specific fares apply: CLC number, personal identification code, serial number, credentials number, membership of organisations which have special agreements with Trenitalia, data on academic institutes and/or Universities, ISEE (Equivalent Economic Situation Indicator) data. Additional data acquired in the event of tickets issued at a discounted fare for voters: electoral card identification (card number).

- **Passenger data collected during the purchasing process for a non-transferable product and/or ticket (optional):** personal identity document details for Intercity Notte, loyalty card code.
- **Passenger data collected during the purchase of a ticket linked to a Carta Blu or Disability Card (optional):** disability category (e.g., BLND – visually impaired or blind passengers; WCHR – passengers with reduced mobility who are able to board, disembark, and move independently; DEAF – hearing-impaired passengers; DPNA – passengers with intellectual or behavioural disabilities).
- **Passenger data acquired while verifying the validity of the Intercity Notte ticket (mandatory):** personal identity document details. Passenger data checked to verify the validity of other tickets, where necessary: identity document, non-transferable document granting a discount.
- **Buyer data acquired in the event it is necessary to issue an invoice:** name and surname or company name, tax code or VAT number, address and billing address.

¹ Name, surname, email address and mobile phone number are mandatory for: Freccie, Intercity and Intercity Notte trains purchased through any sales channel; single regional train tickets if purchased online or through other Operators/Carriers/Companies; combined tickets; and tickets that fall under the sole responsibility of Trenitalia's partners in the case of online purchases. Name, surname, email address, mobile phone number and date of birth are mandatory for: season tickets purchased through any sales channel; the Trenitalia Pass; purchases made through Carta Verde and Carta Argento; and journeys made as a Companion for the holder of a Carta Blu, Disability Card, or Concessions III and VIII

• If you wish the purchase data relating to local, regional, and interregional public transport season tickets to be transmitted to the Italian Revenue Agency for the preparation of the pre-filled tax return pursuant to the Decree of the Ministry of Economy and Finance of 29 March 2023, additional passenger and purchaser data will be collected during the purchase process, including the tax code of the season ticket holder.

In cases involving the purchase of tickets with reductions reserved for people with disabilities and reduced mobility, Trenitalia indirectly processes special data.

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

III. Purpose of data processing

Personal data will be processed for the following purposes:

- a) To issue the ticket and/or non-transferable product. Nature of the provision: *Mandatory*. Legal basis: *Contractual*;
- b) Operational management of sales and ticketing systems. Nature of the provision: *Mandatory*. Legal basis: *Contractual*;
- c) Sending of any potential service communications related to the journey purchased through the contact details provided by the data subject. Nature of the provision: *Mandatory*. Legal basis: *Legitimate interest*;
- d) To verify the validity of the ticket. Nature of the provision: *Mandatory*. Legal basis: *Contractual*;
- e) Issuance of an invoice. Nature of the provision: *Mandatory*. Legal basis: *Legal obligation*;
- f) Sending of purchase information and tax code to the Italian Revenue Agency for the purpose of preparing a pre-filled tax return. Nature of the provision: *Optional*. Legal basis: *Consent*;
- g) Prevention of fraud in the after-sales stage, secondary ticketing and IT fraud. Nature of the provision: *Mandatory*. Legal basis: *Legitimate interest*;
- h) To protect assets and personnel and manage emergency procedures. Nature of the provision: *Mandatory*. Legal basis: *Legitimate interest*;
- i) Provision of specific assistance in the event of service disruptions, based on the communicated disability category. Nature of the provision: *Optional*. Legal basis: *Consent*.

Provision of the data necessary for the purposes referred to in point a) is “*mandatory*” and any refusal could make it impossible for Trenitalia to issue the relevant ticket and/or non-transferable product, or to provide the discounted rate or to send the customer their ticket and/or non-transferable product. Provision of the data necessary for the purposes referred to in point b) is **mandatory**, and failure to provide such data will make it impossible for Trenitalia to correctly manage the sale of tickets within its information systems, as well as to carry out the related operational, administrative, and control activities, including the recording of sales transactions. Provision of the data necessary for the purposes referred to in point c) is “*mandatory*” and any refusal could make it impossible for Trenitalia to issue the relevant ticket and/or non-transferable product, or to inform you of any service communications. Provision of the data necessary for the purposes referred to in point d) is “*mandatory*” and any refusal could mean that the passenger may not be permitted to continue the train journey or the passenger may be requested to validate the ticket itself. Provision of the data necessary for the purposes referred to in point e) is “*mandatory*” should you request an invoice, and any refusal to provide the requested personal data could make it impossible for Trenitalia to issue an invoice. Provision of the data necessary for the purposes referred to in point f) is “*optional*”, and the only result of denying your consent will be to make it impossible for Trenitalia to send passenger and buyer data to the Italian Revenue Agency for the purpose of preparing a pre-filled tax return. Provision of the data necessary for the purposes referred to in points g) and h) is “*mandatory*” and any refusal could make it impossible for Trenitalia to issue the relevant ticket and/or non-transferable product. Provision of the data necessary for the purposes referred to in point i) is “*optional*”, and any failure to provide consent will only result in Trenitalia being unable to provide specific assistance in the event of service disruptions, based on the communicated disability category.

Any consent given with regard to the purposes outlined in point f) may be freely withdrawn at any time, without prejudice to the lawfulness of the processing of data carried out before its withdrawal. Consent may be withdrawn in accordance with the procedures described on the Trenitalia web page > Information > season ticket for pre-filled tax return.

Any consent given with regard to the purposes outlined in point i) may be freely withdrawn at any time, without prejudice to the lawfulness of the processing of data carried out before its 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

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. In addition, the data may be processed by companies that carry out activities on behalf of Trenitalia as Data Processors, including IT services companies, other railway companies, “payment gateway” service companies, railway services companies for Intercity Notte trains and, in the case of the purchase of combined travel tickets, the data may be processed by Trenitalia’s partners as Joint Data Controllers (see section I).

These companies have signed a specific contract that duly regulates the processing entrusted to them and their obligations regarding data protection. Finally, personal data may be transmitted to other independent data controllers in the event of the purchase of tickets and/or non-transferable products from other partners, or in accordance with laws or regulations (e.g. judicial authorities, law enforcement authorities, public bodies, the Italian Revenue Agency).

The updated list of persons and parties authorised to process data is available by contacting the Data Protection Officer at the following email address: protezionedati@trenitalia.it.

V. Personal data retention

Ticket data and of non-transferable products are retained for 10 years from the date of travel or from the expiry date of the season ticket, in order to enable ticket issuance and the performance of related activities connected with the operational management of sales within information systems. Personal identity document details acquired while verifying the validity of the Intercity Notte ticket are stored for 10 days from the date of travel. Data relating to invoices issued are stored for 10 years from the date of registration, pursuant to Article 2220 of the Italian Civil Code. Tax codes acquired for the purposes of transmission to the Italian Revenue Agency are stored until 31 December of the sixth year following each tax year, pursuant to Ministerial Decree 29 March 2023 of the Italian Ministry of Economy and Finance, unless the buyer/passenger raises an objection with Trenitalia, in which case the latter shall erase said data.

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 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.