

X-GO programme Personal Data Protection Policy

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

Before acquiring your personal data, which is required in order for you to sign up for the X-GO Programme, 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 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,
- Data Protection Officer: The Data Protection Officer (DPO) for Trenitalia S.p.A. 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:

- Data acquired during the sign-up process for the X-GO Programme (mandatory): Personal data (first name, surname, date and place of birth), Tax Identification Number (only for those who do not have an Italian tax code: citizenship), home address. Contact details (email, telephone contacts), credentials (username), data collected in the Customer Area (optional): Occupation, number of children, educational qualifications, number of family members, travel habits, travel frequency, preferred service class, most used train, main reason for journeys, frequent route (arrival and departure station), preferred purchasing channel.
- Automatically acquired data: data relating to the journey undertaken (train tickets, services purchased).
- Data collected during the management of the X-GO Programme (optional): Data collected in relation to behaviour, lifestyle or consumption habits; profiling data; opinion polls.

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

Personal data will be processed for the following purposes:

- a. Management of the sign-up process, participation in the X-GO Programme and related services; Nature of the provision: Mandatory; Legal basis: Contractual;
- b. Signing up on the www.trenitalia.com website to grant access to and use of the Customer Area on the website and the Trenitalia app, which allows members to take advantage of certain benefits, such as faster purchasing of your favourite journeys, viewing your purchase history, easily managing your purchased tickets (e.g. for compensation claims), saving your travelling companions or saving an invoice profile with a specific tax code so you can quickly retrieve this information when you make your next purchase, creating a TAP&TAP profile to ensure you are always charged the *best fare*; Nature of the provision: Mandatory. Legal basis: Contractual;
- c. Promotional and marketing activities by Trenitalia relating to services offered by Trenitalia or its Partners; Nature of the provision: Optional; Legal basis: Consent granted during the sign-up process for the X-GO Programme or in the Customer Area;
- d. Profiling activities by Trenitalia; Nature of the provision: Optional; Legal basis: Consent granted during the sign-up process for the X-GO Programme or in the Customer Area;
- e. The transfer of data to Trenitalia France S.A.S to facilitate promotional and marketing activities by Trenitalia France relating to services offered by Trenitalia France or its Partners from France; Nature of the provision: Optional; Legal basis: Consent granted during the sign-up process for the X-GO Programme or in the Customer Area.

The provision of the data necessary to pursue the purposes referred to in points a) and b) is “mandatory” in nature, and refusal to do so will make it impossible for Trenitalia to manage the sign-up process and your participation in the X-GO Programme, as well as provide the services related to the programme and to permit registration on the Trenitalia website: www.trenitalia.com.

The provision of the data necessary to pursue the purpose referred to in point c) is “optional” in nature; therefore, refusal to provide them will not lead to restrictions on the services provided, but will result in the registered user not receiving any informational, advertising and promotional material or customer satisfaction surveys by Trenitalia relating to services offered by Trenitalia or its Partners.

The provision of the data necessary to pursue the purpose referred to in point d) 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 identifying your travel habits and consumer choices for the purpose of offering services that are in line with your personal preferences. The provision of the data necessary to pursue the purpose referred to in point e) 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 transferring your data to Trenitalia France for the purposes of sending you informational, advertising and promotional material relating to services that Trenitalia France or its Partners offer from France.

If you have already signed up as a registered user on the www.trenitalia.com website or if you are already a member of a different Trenitalia loyalty programme, the consent you have given during the sign-up process for the X-GO Programme or the Customer Area shall replace any consent you have already granted.

Any consent given with regard to the purposes outlined in c), d) and e) may be freely withdrawn at any time, without prejudice to the lawfulness of the processing of data carried out before its withdrawal. Consent can be withdrawn by accessing your Customer Area on the website: www.trenitalia.com (in the “Modify details” section), by writing to the following email address: datixgo@trenitalia.it, or by contacting the Data Protection Officer at the following email address: protezionedati@trenitalia.it.

IV. Persons authorised to process personal data

The personal data acquired 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, including IT service companies, companies responsible for the distribution of loyalty services, or catering and caring services. These companies act as Data Processors on behalf of Trenitalia, and 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. Finally, your personal data may be transmitted to other independent data controllers in accordance with applicable laws or regulations (Judicial authorities, Law enforcement authorities). Only if you have granted your consent for the purposes referred to in point III. d) may your data be transmitted to Trenitalia France in order for it to send you informational, advertising and promotional material relating to the services provided by Trenitalia France or other Partners from France. The Trenitalia France policy can be viewed on the website: www.trenitalia.com/trenitalia-france.html.

The up-to-date list of the persons and companies who are authorised to process data is available by contacting the email address: datixgo@trenitalia.it, or by contacting the Data Protection Officer at: protezionedati@trenitalia.it.

V. Personal data storage

Below are the storage times for your personal data by Trenitalia:

- For the purposes outlined in points III. a) and b) of this policy, which make the provision of data mandatory: 10 years of customer inactivity (lack of purchases and/or accumulation of points under the Rewards Programme and subsequent renewals).
- For the purposes outlined in points III. c) and III. d), which make the provision of data optional: data relating to the specific details of purchases shall be stored for marketing or profiling purposes for a period not exceeding 24 and 12 months, respectively, from their initial date of registration, unless they are rendered anonymous.

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 request to exercise your rights at any time, by contacting Trenitalia via the following email address: datixgo@trenitalia.it, or by contacting the Data Protection Officer at this email address: protezionedati@trenitalia.it.

VII. Automated decision-making process and profiling

Trenitalia uses profiling to identify the travel habits and consumer choices of its users, in order to provide services that are in line with customer preferences. This process of profiling involves the analysis of your travel habits in the last 12 months (favourite destinations, average distance travelled, monthly costs incurred, etc.) and it may also entail behavioural advertising and personalized offers.

However, it is possible to oppose such data processing, through the channels outlined in Section VI of the present Policy