

Application for the X-GO Card and participation in prize-giving events - Minors Personal Data Protection Policy

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

Before acquiring the personal data necessary for applying for the X-GO card and participating in prize-giving events, Trenitalia invites you to carefully read the policy regarding personal data protection.

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., represented by the *pro tempore* Chief Executive Officer, with registered office in Piazza della Croce Rossa 1 – 00161 – Rome, can be contacted at the following email address: 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:

- Minor's data acquired during the X-GO Card application phase and upon participation in prize-giving events (mandatory): personal details (first name, surname, date and place of birth), tax identification number (for those without a tax code: citizenship), domicile, contact details (email, telephone numbers), 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.
- Declaring parent's data: personal details (first name and surname).
- Minor's data collected automatically: travel data (ticket, services purchased); data relating to activities with Programme partners (e.g., points to be credited, etc.); data relating to the use of points.
- Minor's data collected through the use of the X-GO Card and during the management of prize-giving events (optional): data suitable for detecting behaviour, lifestyle or consumption habits; profiling data; opinion polls.
- Minor's 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 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

Personal data will be processed for the following purposes:

- a) Provision of X-GO Card; Nature of data provision: Mandatory; Legal basis: Contractual;
- b) Provision of services connected to prize-giving events (e.g. Accumulation and use of points, customer recognition at call centres, etc.); Nature of data provision: Mandatory; Legal basis: Contractual;
- c) 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;
- d) Prevention of fraud in the after-sales stage, secondary ticketing and IT fraud; Nature of the provision: Mandatory; Legal basis: Legitimate interest.

- e) Administrative and accounting activities required for the proper management of the X-GO Programme (such as, for example, invoicing activities, points reporting, internal audits, and administrative compliance); Nature of the provision: Mandatory. Legal basis: Legal obligation
- f) 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;
- g)
- h) 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;
- i) 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), b), c), d) and e) is “mandatory” in nature, and refusal to do so will make it impossible for Trenitalia to manage the application process for the X-GO Card and for requesting participation in prize-giving events and to permit registration on the Trenitalia website: www.trenitalia.com. With reference to the purposes referred to in points a) and b), the provision of the data will also make identification easier when purchasing tickets and requesting refunds, lodging complaints, etc.

The provision of the data necessary to pursue the purpose referred to in point f) 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 g) 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 h) 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 the minor in question has already signed up as a registered user on the www.trenitalia.com website or if he/she is 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 in the Customer Area shall replace any consent you have already granted. Any consent given with regard to the purposes outlined in f), g), and h) 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 providing rewards, benefits, and loyalty services, catering and caring companies, Call Center management companies. 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 (e.g. Judicial authorities, Law enforcement authorities, Travel agencies). Only if you have granted your consent for the purposes referred to in point III. h) 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), b), c), d) and e) of this policy, which make the provision of data mandatory: For a period of 10 years after customer inactivity (lack of purchases and/or accumulation of points under the Rewards Programme and subsequent renewals).
- For the purposes outlined in points III. f) and g), 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 personal data covered by this privacy policy, the data subject has the right to request from Trenitalia S.p.A. the following:

- access: the data subject may request confirmation as to whether or not data concerning them is being processed, as well as further clarifications regarding the information referred to in this policy (art. 15);
- rectification: the data subject may request to rectify or add to the data they have provided us, if it is inaccurate or incomplete (art. 16);
- deletion: the data subject may request that their 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 (art. 17);
- limitation: the data subject may request that their data be processed only for the purposes of data retention, with the exclusion of other processing, for the period necessary to rectify their data, in the event of unlawful processing for which they oppose deletion, if they are required to exercise their rights in court and the data stored by us may be useful to them and, finally, in the event of opposition to data processing and pending the verification of the prevalence of our legitimate reasons over theirs (art. 18);
- portability: the data subject may request to receive their data, or have it transferred to another data controller as stipulated by them, in a structured format, which is commonly used and readable by an automatic device (art. 20);
- objection: the data subject may object at any time to the processing of their data, unless there are legitimate reasons for us to proceed with processing which prevail over theirs, for example to conduct our operations or mount a defence in court (art. 21).

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.

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.

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 personalised offers.

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