

Assistance and rerouting in the event of service disruptions

Personal Data Protection Policy

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

Before acquiring your personal data, which is required to provide assistance and rerouting in the event of service disruptions, Trenitalia S.p.A. invites you to carefully read the personal data protection policy.



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



II. Types of personal data

In this section, we indicate the types of data we have collected

- **Data subject data:** name and surname; email address; telephone number; Cartafreccia/XGO code (if acquired during ticket purchase); train number; PNR/ticket ID; final destination of the journey; destination address, exclusively if needed for specific types of rerouting (e.g. hotels, taxis). Special data: depending on the type of rerouting necessary, Trenitalia may process personal data that falls under the “special” category (e.g. data relating to health).
- **Data of other travelling companions, in the event that the PNR refers to multiple tickets:** name and surname; Cartafreccia/XGO code (if acquired during ticket purchase); train number; PNR/ticket ID; final destination of the journey; destination address, exclusively if needed for specific types of rerouting (e.g. hotels, taxis). Special data: depending on the type of rerouting necessary, Trenitalia may process personal data that falls under the “special” category (e.g. data relating to health).

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

In this section, we indicate why we have collected your data

- a) Provision of assistance and rerouting in the event of service disruptions; Nature of data provision: mandatory; Legal basis: legal - Regulation (EU) 2021/782 of the European Parliament and of the Council of 29 April 2021 on rail passengers’ rights and obligations.
- b) Transmission to third parties of the data necessary to manage specific types of assistance and rerouting (e.g. hotels, taxis); Nature of data provision: optional; Legal basis: consent.

The provision of the data necessary to pursue the purpose referred to in point a) is “mandatory” in nature, and refusal to do so could make it impossible for Trenitalia S.p.A. to manage the provision of the rerouting service.

The provision of the data necessary to pursue the purpose referred to in point b) is “optional” in nature, and refusal to do so could make it impossible for Trenitalia S.p.A. to provide specific types of rerouting (e.g. hotels, taxis).

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 to protezionedati@trenitalia.it.



IV. Data recipients

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

In order to achieve the aforementioned purposes, your personal data will be processed by the following parties:

Parties answerable to Trenitalia S.p.A.:

- Persons authorised to process data (Trenitalia S.p.A. employees)
- Other companies from the FS Group
- IT Services companies
- Companies that manage hotel booking platforms

Parties not directly answerable to Trenitalia S.p.A.:

- Judicial authorities
- Law enforcement authorities
- Parties involved for the booking of additional and/or alternative services

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. The data will never be disseminated.

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. Data storage

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

The personal data that you have provided to us will be stored for 10 years from the date of travel.



VI. 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 are 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 storage, 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 make a request to Trenitalia S.p.A. to exercise your **rights** at any time by contacting the **Data Protection Officer** at the following email address: protezionedati@trenitalia.it

Consent

By selecting "I consent", you are granting your consent to the transmission of your personal data, including special data, to third parties where necessary to manage specific types of rerouting (e.g. hotels, taxis):

- ☐ I consent
☐ I do not consent

In the event that the PNR refers to multiple tickets, by selecting "I consent", you are granting consent on behalf of your travelling companions — whom you shall have duly informed — to the transmission of their personal data, including special data, to third parties where necessary to manage specific types of rerouting (e.g. hotels, taxis):

- ☐ I consent
☐ I do not consent

Date.....

Signature

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