

Accompaniment Service
Personal Data Protection Policy
(Pursuant to Arts. 13 and 14 of European Regulation No. 679/2016)

Before acquiring your personal data to provide you with the “accompaniment” service, Trenitalia S.p.A. invites you to carefully read the policy regarding personal data protection.

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 the *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 request

- **Data for adult travellers:** name, surname, date and place of birth, sex, residential address, mobile number, email address, details of identity document, copy of identity document.
- **Data for minor travellers:** name, surname, date and place of birth, sex, residential address, details of personal identity document, copy of personal identity document, minor’s mobile number (if he/she possesses one).
- **Data for the person accompanying the minor prior to departure:** name, surname, telephone number, details of identity document, copy of identity document.
- **Data for the person taking custody of the minor upon arrival:** name, surname, telephone number, details of identity document, copy of identity document.
- **Data for the person requesting the service (in the case of a minor: their parent/guardian):** name, surname, date and place of birth, residential address, telephone number, details of identity document, copy of identity document.

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 the purpose of the processing carried out on your data

- a. Management of the accompaniment service; Nature of provision of data (*Mandatory*); Legal basis (*Contractual*)

Provision of the data necessary for the purpose referred to in point a) is “*mandatory*” and any refusal will make it impossible for Trenitalia S.p.A. to provide the accompaniment service.

IV. Data recipients

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

In order to pursue the aforementioned purpose, 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 service companies.
- Companies engaged to provide the accompaniment service

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

- Judicial authorities
- Law enforcement authorities

Your 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. Your data will never be disseminated.

The up-to-date list of data recipients is available by contacting the Data Manager at commercialeav@trenitalia.it, or by contacting the **Data Protection Officer** at the 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 us with will be stored for:

Purposes which make the provision of data mandatory: 13 months commencing 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 ask Trenitalia S.p.A. 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 S.p.A. at commercialeav@trenitalia.it or by contacting the **Data Protection Officer** at: protezionedati@trenitalia.it.