

**Trenitalia S.p.A. promotional activities
Personal Data Protection Policy**

Art. 14 of European Regulation No. 679/2016

In relation to your personal data received from Italia Loyalty S.p.A. for marketing and promotional purposes, Trenitalia invites you to carefully read this 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, represented by the Chief Executive Officer *pro-tempore*, with registered office in Piazza della Croce Rossa 1 – 00161 – Rome, 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.

II. Types of personal data

The personal data being processed fall into the following categories:

- **Mandatory data collected directly from the data subject:** Name, contact information (e-mail)

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

III. Purpose of data processing

Your personal data will be processed for the following purposes:

- a. Promotional and *marketing* activities by Trenitalia. Nature of data provision: *Optional*. Legal basis *Consent*

You have granted Italia Loyalty S.p.A. consent to transfer your data to Trenitalia S.p.A. for marketing and promotional purposes.

Any consent given may be freely withdrawn at any time, without prejudice to the lawfulness of the processing of data carried out prior to withdrawal.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 by contacting the **Data Protection Officer** at the following email address: protezionedati@trenitalia.it.

IV. Persons authorised to process personal data

Your personal data will never be disseminated and 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 your personal data, and to prevent unauthorised parties from accessing or carrying out unauthorised processing on data. Furthermore, your data may be processed by companies that carry out activities on behalf of Trenitalia, including **IT Services 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. Finally, your personal data may be transmitted to other **independent data controllers** in accordance with applicable laws or regulations (Judicial authorities, Law enforcement authorities).

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

V. Personal data retention

Below are the storage times for your personal data:

- *For the purposes outlined in points III. a), which make the provision of data optional:* data are stored for *marketing* purposes for a period not exceeding 24 months from their collection.

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.