

REROUTING IN THE EVENT OF SERVICE DISRUPTIONS

Personal Data Protection Policy

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

Before collecting your personal data for the provision of rerouting services, 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

- The **Data Controller** is Trenitalia S.p.A., with registered office in Piazza della Croce Rossa 1, Rome, Italy, represented by the pro-tempore Chief Executive Officer, and can be contacted at: titolaretrattamento@trenitalia.it.
- The **Data Protection Officer** can be contacted at the following email address: protezionedati@trenitalia.it.



II. Types of personal data

In this section, we indicate the types of data we ask you to provide

The personal data being processed fall into the following categories:

Data collected directly from the data subject:

- **Standard data:** personal details (first name, surname), contact information (email, phone numbers), CartaFRECCIA/XGO code (if provided during the ticket purchase phase), travel data; and, only where necessary for specific types of rerouting (e.g., hotels, taxis), the destination address.
- **Special categories of data:** depending on the type of rerouting required, Trenitalia S.p.A. may process data that could reveal the data subject's state of health.

Personal data of other travelling companions (where multiple tickets are associated with the same PNR):

- **Standard data:** personal details (first name, surname), contact information (email, phone numbers), CartaFRECCIA/XGO code (if provided during the ticket purchase phase), travel data; and, only where necessary for specific types of rerouting (e.g., hotels, taxis), the destination address.
- **Special categories of data:** depending on the type of rerouting required, Trenitalia S.p.A. may process data that could reveal the data subject's state of health.



III. Purpose of data processing

In this section, we indicate why we collect your personal data

The data we ask you to provide is collected for the purpose of providing assistance and rerouting services in the event of operational disruptions.

In particular, your data will be processed for the following **purposes**:

- a. Provision of assistance and rerouting services in the event of operational disruptions, including the potential transmission of necessary data to third parties to manage specific types of rerouting (e.g., hotels and taxis) (legal basis: legal obligation pursuant to Art. 20 of EU Regulation 2021/782);
- b. Management of customer satisfaction surveys (legal basis: consent).

The provision of data for the purposes set out in point a) is "*mandatory*." Any refusal to provide this data may make it impossible for Trenitalia S.p.A. to provide the assistance and rerouting services.

The provision of data for the purposes set out in point b) is "*optional*". Therefore, failure to provide such data will only result in Trenitalia S.p.A. being unable to conduct the customer satisfaction survey, without affecting the services for which data provision is mandatory.

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 pursue the aforementioned purposes, your personal data will be processed by the following parties:

➤ **Within** Trenitalia S.p.A.:

Your personal data shall only be made accessible to those within the company who need them for the duties they perform or due to the hierarchical position they occupy. 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 the following categories of entities performing ancillary activities on behalf of Trenitalia S.p.A.:

- **Service providers** (including IT companies) entrusted with the management of IT services, rerouting services, and hotel booking platforms;
- **Companies belonging to the same Group** as Trenitalia S.p.A.

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.

➤ **Outside** Trenitalia S.p.A.:

Personal data may also be transmitted to other independent data controllers, either based on laws or regulations (e.g., Hotels, Taxis, Judicial Authorities, Public Security Authorities, etc.) or based on the specific consent provided by you. These subjects will process the data as indicated in their own privacy policies, which we invite you to review.

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. Dissemination of data

In this section, we guarantee that your data will not be disseminated

Your personal data will never be published, displayed or made available/consultable to unspecified parties.



VI. Data retention

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 (point a): 10 years from the date the data was acquired;
- Purposes which make the provision of data optional (point b): 24 months from the acquisition of the data.



VII. 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 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).

At any time, you may request exercise of your **rights** from Trenitalia S.p.A., which can be contacted at titolaretrattamento@trenitalia.it or by contacting the **Data Protection Officer** who can be contacted at 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.