

According to the art. 13 of the European Regulation 2016/679 (hereinafter the "GDPR") the following information is provided on the processing put in place by ADR S.p.A., in the context of calls to the airport information centers (065151).

## **1. DATA CONTROLLER**

The data controller is ADR S.p.A. with registered office in via Pier Paolo Racchetti, 1 - 00054 Fiumicino, Rome (hereinafter the "Data Controller" or "ADR S.p.A.").

## **2. DATA PROTECTION OFFICER**

ADR S.p.A. has appointed a Data Protection Officer. The contact details of the Data Protection Officer are available at [www.adr.it](http://www.adr.it).

## **3. TYPES OF DATA PROCESSED**

The data processed by the Data Controller may include personal data and contact data (e.g. e-mail address and phone number).

In order to manage your request, the Data Controller may also have the need to process personal data of third parties. In this case you undertake to inform these subjects of the treatments carried out as indicated below, also by providing them with this information.

## **4. PURPOSE OF THE PROCESSING AND CONSEQUENCES IN THE EVENT OF FAILURE TO PROVIDE DATA.**

The personal data provided by you are processed by the Data Controller in the context of the provision of switchboard services, in connection with the management of information system operations, in order to:

- a) fulfil the request made by you through the channel indicated;
- b) after recording the call, in the manner set out in paragraph 5) below, guarantee and improve the quality of the service;
- c) comply with any legal obligations to which the Data Controller may be subject.

For the purposes referred to in points a) and c), the provision of your personal data is necessary and failure to provide them will not allow the Controller to provide you with the requested service. However, the provision of your personal data for the purpose referred to in point b) is optional. To this end, you may exercise your right to object by notifying the operator directly during the call.

## **5. LEGAL BASIS OF THE TREATMENT**

The processing of the data referred to in paragraph 3(a) above is carried out in order to comply with your request; therefore, the legal basis for the processing is the performance of contractual and pre-contractual measures referred to in GDPR Article 6(1)(b), also with reference to any contract entered into with ADR S.p.A.

The processing of your personal data for the purpose referred to in paragraph 3(b) is carried out on the basis of the legitimate interest of the Data Controller, in accordance with the logic disclosed in this notice, pursuant to GDPR Article 6(1)(f). Finally, the legal basis for processing under paragraph 3(c) is the fulfilment of a legal obligation in accordance with GDPR Article 6(1)(c).

## **5. METHOD OF TREATMENT**

The data is processed in compliance with the regulations in force by means of manual, IT and telematic tools, with logics strictly connected to the indicated purposes, in order to guarantee the security and confidentiality of the data.

Calls will be recorded and a sample of the recordings can be analyzed, using automated tools, in order to guarantee and improve the quality of the service rendered. The Data Controller adopts the appropriate technical and organizational requirements aimed at making this treatment compliant with the relevant legislative and regulatory requirements.

## **6. DATA STORAGE TIMES**

Your personal data will be processed exclusively for the time necessary to satisfy your request. Subsequently, they can be stored in a manner that guarantees confidentiality, in accordance with the provisions of the current regulations regarding the limitation period.

With specific reference to the recording of calls for the purposes referred to in paragraph 3 above, these may be kept for a period not exceeding 6 months.

## **7. RECIPIENTS OF DATA**

For the pursuit of the above-mentioned purposes, your personal data will be disclosed to the Controller's employees and collaborators, who will act as authorised processors. In addition, your personal data may be processed by the entity ADR S.p.A. used to manage the frontend ICT call centre: Numero Blu Servizi S.p.A. has been appointed data processor for this purpose, as the company entrusted with the call centre services.

In fulfilling any legal obligations, your data may also be communicated by the Data Controller to the competent Public Authorities, who would act as (independent) data controllers. In no case will your personal data be disseminated.

## **8. LOCATION OF THE CALL CENTER**

With reference to the "New regulatory provisions on call center activities Article 1, c. 243, of Law no. 232 of 2016" ADR S.p.A. hereby informs you that the frontend ICT call centre operators answer from Italy.

## **9. RIGHTS OF INTERESTED PARTIES**

Finally, we inform you that the articles 15-22, GDPR, confer on the interested parties the possibility of exercising specific rights. In particular, the interested party may obtain - if

certain conditions are met - from the Data Controller: access, rectification, cancellation, limitation of processing, revocation of consent and portability of data concerning himself.

Furthermore, the interested party has the right to oppose the processing of data subject of this information at any time. In the event that the right of opposition is exercised, the Data Controller reserves the right not to proceed with the request, and therefore to continue processing, only if there were legitimate cogent reasons for proceeding with the processing that prevail over interests, rights and freedom of the interested party.

In particular, with reference to the automated processing performed to analyze the sample of records for the purpose of evaluating the quality of the service, you can object by communicating it directly to the operator during the call.

The above rights may be exercised with an informal request to the Data Protection Officer (DPO) at the following address [dpo@adr.it](mailto:dpo@adr.it). The contact details of the Data Protection Officer are available on [www.adr.it](http://www.adr.it). The right to file a complaint with the Italian Data Protection Authority pursuant to Article 77 GDPR remains unaffected.

The Data Controller reserves the right to update this policy.

Last updated in October 2022.