

## **INFORMATION REGARDING DATA PROCESSING**

**Pursuant to Art. 13 of the EU 2016/679 Regulation**

**Customers / consumers section**

**ARE – AIRLINES REPRESENTATIVE EUROPE S.R.L** (hereinafter referred to as “ARE S.R.L.”) having its registered office in Via Nomentana 323 Rome – CAP 00162, VAT IT04105181004, pursuant to articles 4 and 28 of the legislative decree 30 June 2003, n. 196 - Privacy Code (hereinafter referred to as "Code") and of the articles 4, n. 7) and 24 of EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data (hereinafter referred to as "EU Regulation") informs you, according to article 13 of the Code and EU Regulation, to be responsible for your personal data and that it will comply with the related processing procedures for the purposes and methods indicated later in this document.

*By processing personal data we mean any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.*

### **Data Controller and Data Processors.**

In the activity of supplying air transportation services, the Data Controller remains the Company (client), while ARE S.r.l. assumes the role of "Responsible for processing" as required by art. 28 of the 2016/679 European Regulation that identifies the person in charge of the person who performs processing operations on behalf of the Data Controller, subject to written authorization. It will therefore be up to the Data Controller to proceed with the appointment of ARE S.r.l. as Responsible. Otherwise, within the purpose of supplying its ground operation services, ARE - AIRLINES REPRESENTATIVE EUROPE S.R.L. with registered office in Via Nomentana 323 Rome – CAP 00162, operates as Data Controller. We inform you, therefore, that such data will be processed manually and / or with the support of IT or telematic means for the following purpose.

### **Primary purposes**

The processed data, which indicate the geographical position of people or objects through an electronic communication network, are used for the purposes related to ticketing services, to comply with any other obligations required by law in the activities of airport services, as well as for the management of any dispute between the parties (complaints, breaches of contract between the parties) and storage of

technical / administrative documentation. The data is either supplied by the client to our company to perform the delegated operations, or by the customers themselves at the ticket offices.

Due to the principle of the "necessity" of the data (thus excluding the request for data not strictly necessary), the interested party is informed that for the purposes reported, his refusal to provide the data, will in fact make it impossible to carry out the planned treatments, making in fact, the services provided by the relationship between the parties or the fulfillment of particular legal obligations impracticable.

### **Types of data subject to processing**

In carrying out the assignments, sensitive data will not be processed (such as racial and ethnic origin, political opinions, religious or philosophical convictions, membership of trade unions, genetic data, biometric data, data related to health or sex life), if not for purposes strictly related to services provided on behalf of the customer (ex: any food intolerances to be communicated to the carrier, situations of disability for accompanying services and the like).

### **Communication and dissemination of personal data for the pursuit of primary treatment purposes**

The data collected may be communicated, always for needs related to the execution of the mandate, to internal staff in order to perform processing operations, and as an alternative to external collaborators specifically appointed by ARE Srl or the Customer (as Owner of the treatment).

Your data will in no way be disseminated or transferred/communicated to third countries outside the European Union.

### **Data retention times and other information.**

Pursuant to art. 13, paragraph 1, letter (f) of the EU Regulation, the data will be kept for the time necessary to carry out the activities covered by the mandate in compliance with the retention times of the data and documents required by law.

The data will be kept for the times defined by the relevant legislation, which are specified in art. 13, paragraph 2, letter (a) of the EU Regulation. Furthermore, the five-year or ten-year terms for the conservation of documents and related data of a civil, accounting and tax nature are still in force, as provided for by the laws in force. With reference instead to any personal data subject to processing for marketing purposes, the same will be kept for 24 months or less, if the withdrawal of the specific consent by the interested party intervenes. Finally, with specific reference to personal data processed for profiling purposes, it will be retained for 12 months or less, if the revocation of the specific consent by the interested party intervenes.

We inform you that data is not included in automated decision-making processes.

ARE S.r.l. has also provided at setting up suitable security measures to protect data, in order to guarantee a high level of security in processing operations.

### **Exercise of rights by the interested party.**

Pursuant to Article 7 of the Privacy Code and pursuant to articles 13, paragraph 2, letters (b) and (d), 15, 18, 19 and 21 of the EU Regulation, we inform the interested party that:

- a) he has the right to ask the Data Controller to access personal data, correct or cancel it or limit their processing or to oppose their treatment, in addition to the right to data portability;
- b) he has the right to make a complaint with the Italian Data Protection Authority (Garante) for the protection of personal data, following the procedures and indications published on the official website of the Authority on [www.garanteprivacy.it](http://www.garanteprivacy.it);
- c) any corrections or deletions or limitations of the processing performed at the request of the interested party - unless this proves impossible or involves a disproportionate effort - will be communicated by the Data Controller to each of the recipients to whom the personal data has been transmitted. The Data Controller may inform the party involved of these recipients if the data subject requests it.

The exercise of rights is not subject to any form constraint and is free.

For the sake of completeness, see article 7 of the Privacy Code, while articles 15 to 23 of the EU Regulation are available at this link:

<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=I>