

INFORMATION LEAFLET IN TERMS OF ARTICLE 13 OF EUROPEAN REGULATION 679/2016 GDPR CONCERNING PROTECTION OF PERSONAL DATA

Airports of Rome S.p.A. (hereinafter referred to as ADR) has launched a *Call for Ideas* for the development of a *Proof of Concept* as part of the Acceleration Programme at “Leonardo da Vinci” International Airport at Fiumicino. The ADR intends using this information leaflet to provide the information required by Article 13 of EU Regulation UE 2016/679 (hereinafter referred to as the “GDPR”) concerning the processing of personal data for the transmission of requests for information and ideas for participating in the initiative through the relevant form available from the *Innovation* section of the ADR website.

1. DATA CONTROLLER

Airports of Rome S.p.A. with registered office at 1 Via Pier Paolo Racchetti, - 00054 Fiumicino (Rome), is the Data Controller for processing personal data (“Data Controller”).

2. THE DATA PROTECTION OFFICER

ADR has appointed a Data Protection Officer (“DPO” or “Person responsible for the protection of data”) contactable at the following electronic mail address: dpo@adr.it.

3. TYPE AND METHOD OF PROCESSING

Pursuant to the principles enshrined in current regulations, personal data¹ is that which is voluntarily inserted in the *form* available for the transmission of requests for information and/or ideas on the ADR site and in particular concerns the name, surname and e-mail address.

The data are processed in terms of current regulations concerning computerised, telematic and manual means, adopting criteria for the purposes indicated, to guarantee the security and confidentiality of such data.

4. PURPOSE AND LEGAL BASIS FOR PROCESSING

The processing of personal data is carried out by Airports of Rome S.p.A., following a voluntary request, exclusively for purposes of facilitating requests for information and/or ideas relating to the *call for ideas* launched by ADR.

The provision of data is required for the abovementioned purpose, and in the event that permission for processing is denied, transmission of the requested information and/or ideas would not be possible.

Processing is necessary in terms of Article 6(1)(b) of the GDPR relating to the implementation of a contract to which the interested person is a party or to the implementation of pre-contractual measures taken by the parties.

5. DATA RECIPIENTS

Only those persons entrusted to receive the information and/or ideas requested will acquire knowledge of the personal data contained in the form, in terms of current regulations for the processing of personal data.

Personal data contained in alerts may be processed by third party subjects assisting ADR in activities related to the *call for ideas*, in their capacity as external officials responsible for processing in terms of Article 28(3) of European Regulation 679/2016 GDPR.

Such data may also be processed by persons who the Data Controller has appointed to maintain and manage the IT platform used or physical archives.

In no circumstances will the data be subject to publication.

¹ Personal data in the meaning of the GDPR is: “any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that natural person (“the Data Subject”). The GDPR defines particular categories of personal data which may be used to show “racial or ethnic origin, political opinions, religious or philosophic convictions, or trade-union membership, [...] genetic data, biometric data intended to unequivocally identify a natural person, data relating to health or sex life or the sexual orientation of the person”.



6. TRANSFER OF DATA OUTSIDE THE EU

Data may not be published and/or communicated to third parties located outside the European Economic Area.

7. DATA RETENTION TIME

Data may only be retained for the period necessary for the purposes for which it was gathered and processed pursuant to the minimalization principle set out in Article 5(1)(c) of the GDPR.

In particular, personal data included in the request for information and/or ideas referred to in this information leaflet will be retained for the prescribed period applicable from the time of the conclusion of the procedure launched by ADR in the Call for Ideas for the development of a Proof of Concept as part of the Acceleration Programme at “Leonardo da Vinci”, international airport except, where further retention of the information may be required to protect a legal right.

7. RIGHTS OF INTERESTED PARTIES

Interested parties (namely those persons to whom the data refer, or the issuer or reporter), may at any time exercise vis-à-vis ADR, as Data Controller, the following rights described in Sub-section 15 of the GDPR: the right to access data which concerns them, correction of inaccuracies, portability, limitation of and objection to processing, or applicable as may be appropriate.

The rights set out above may be exercised by contacting the *Data Protection Officer* at the following e-mail address dpo@adr.it or in writing marked for the attention of the DPO at the following address: 1 Via Pier Paolo Racchetti, 00054 Fiumicino (RM).

Interested parties have the right to lodge a complaint directly to the Guarantor for the protection of personal data in terms of Article 77 of the GDPR.

8. AMENDMENT TO INFORMATION LEAFLET

The Data Controller reserves the right to amend and update this information leaflet.

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