

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 SpA, in the context of calls to the airport information centers (066595.1 06.79494.1 and 06.6595.3640) and first aid (06.6595.3133 / 3134).

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**").

2. 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), as well as special categories of personal data, data relating to your position and further data acquired during registration.

In order to manage your request, the Data Controller may also have the need to process personal data of third parties, possibly even minor ones (your family, friends, colleagues, etc.). In this case you undertake to inform these subjects of the treatments carried out as indicated below, also by providing them with this information.

3. PURPOSE OF THE PROCESSING AND CONSEQUENCES IN THE EVENT OF FAILURE TO PROVIDE DATA.

The personal information you provide is processed by the Data Controller in order to perform the Call Center service for the following activities:

- a) flight and airport information in general;
- b) first aid.

Furthermore, your personal data may be processed for:

- c) fulfill any legal obligations to which the Data Controller may be subject to.

Providing your personal data for the purposes referred to in point b) and c) is optional and failure to do so could not allow the ADR to lend you the requested service.

Furthermore, the Data Controller will only register the calls to the airport Call Center for flight information and carry out a sample analysis of them, according to the procedures set out in paragraph 5 (below), with the aim of guaranteeing and improving the quality of the service offered. The provision of data for this purpose is optional and you can refuse the data processing by communicating it directly to the operator during the call.

4. LEGAL BASIS OF THE TREATMENT

The processing of data referred to in paragraph 3, lett. a), is carried out to fulfill your request; therefore, the legal basis of the processing is constituted by the execution of contractual and pre-contractual measures referred to in Article 6, c.1, lett. b), GDPR.

The processing of your personal data, also of particular nature, for the purposes referred to in paragraph 3, lett. b) is based on the need to protect a vital interest of the interested party or a third party, pursuant to Article 6, c.1, lett. d), GDPR.

Otherwise, the legal basis of the treatment referred to in paragraph 3, lett. c) is constituted by the fulfillment of a legal obligation in accordance with Article 6, paragraph 1, lett. c), GDPR.

With regards to the processing relating to the analysis of automated calls, the latter is carried out on the basis of the legitimate interest of the Data Controller, according to the logic made known within this information.

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 aforementioned purposes, your personal data will be known by the employees and collaborators of the Data Controller, who will operate as authorized processing data.

Furthermore, the Data Controller may need to communicate your personal data to third parties and, in particular:

- AdR Tel S.p.A., appointed for this purpose as data controller, as company in charge of call center services, which in turn may use third parties (Global Remote Services S.r.l.) appointed in accordance with art. 28, GDPR.
- Authenticity.ai Corporation, appointed as data processor, for the analysis of calls recorded for the improvement of services rendered.

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 Tel informs you to use, for all the call center services of an operator, services located in Romania.

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 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. The contact details of the Data Protection Officer are available on www.adr.it.