

PRIVACY NOTICE

Aeroporti di Roma S.p.A. in accordance with applicable regulations (Italian Legislative Decree 231/2001 and Italian Law no. 179/2017) and in line with international *best practices* has implemented (for all ADR Group companies) a process for collecting and managing reports (*Whistleblowing*).

According to the article no. 13 of the European Regulation 2016/679 (hereinafter the "GDPR") the following information is provided on the processing put in place by Aeroporti di Roma S.p.A. in the context of *Whistleblowing system*.

Aeroporti di Roma wishes to inform you about the use of Personal data of reporting/reported subjects and any other third parties involved of the, in relation to the management of the *whistleblowing* process regulated by *Whistleblowing Policy*, drawn up in compliance with the provisions under Italian Law no. 179/2017 "*Provisions for the protection of individuals reporting crimes or irregularities of which they have become aware in the context of a public or private employment relationship*", which should be read in full for further details.

1. DATA CONTROLLER

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

2. TYPES OF DATA PROCESSED

Data processed by Data Controller may include personal data¹ as:

- name and surname of the reporting subject together with any other information they may wish to provide, such as telephone number, e-mail address, postal address, etc.
- the information on the reported party that can be entered in the digital procedure specifically activated by ADR to enable the report to be forwarded.

Personal data are 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.

Data processing is carried out through the use of:

- an IT platform accessible through the ADR websites of and available at the [link](#);
- paper mail addressed to the Whistleblowing Team shall be delivered unopened (as delivered by the postal service) to the Whistleblowing Team Secretariat;
- mail address segnalazioni.adr@adr.it (only members of the Whistleblowing Team and the Technical Secretariat shall have access to the *e-mail* box).

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

Personal data of the are processed for purposes connected with the application of the *Whistleblowing Policy* and in compliance with the provisions of Italian Law no. 179/2017 and Italian Legislative Decree no 231/2001. Your personal data are processed in accordance with:

- article 6, n. 1 letter c), GDPR, processing is necessary for compliance with a legal obligation to which the controller is subject;
- article 6 n. 1 letter f), GDPR, processing is necessary for the purposes of the legitimate interests pursued by the controller.

Only personal data that is relevant and necessary for the purposes may be processed.

¹ 'Personal data', as specified in Article 4 of the Regulation, means "any information relating to an identified or identifiable natural person ('data subject'); 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, physiological, genetic, mental, economic, cultural or social identity of that natural person".

4. RECIPIENTS OF DATA

Your personal data may only be used by ADR's staff responsible for processing it (members of the *Whistleblowing Team* and its technical secretariat) who have been assigned a specific role and have been given appropriate instructions to ensure confidentiality.

Your personal data may also be used by ADR Supervisory Body or by ADR's Group Companies Supervisory Bodies.

Your data may be communicated to the following third parties, who act under the direction and control of the Data Controller as external data processors pursuant to Article 28, paragraph 3 of the Regulation:

- *Unione Fiduciaria*, which operates the technological platform used to manage the *whistleblowing* process on behalf of ADR.

Your personal data will never be disseminated.

5. DATA TRANSFER ABROAD

Any personal data communicated will not be transferred abroad.

6. PERIOD FOR WHICH PERSONAL DATA WILL BE STORED

Personal data may be kept for a period of time not exceeding what is necessary for the purposes for which it has been collected and processed.

Personal data contained in the reports are kept completion during the verification and investigation activities and for the period following in accordance with applicable law.

In the case where judicial and/or disciplinary action is taken against the reported subject or reporting subjects (e.g. making statements that are in bad faith, false or defamatory), personal data may be kept until the conclusion of the judicial and/or disciplinary proceedings and also for the following period accordance with applicable law.

7. 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 or erasure of personal data, 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.

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

You have the right to lodge a complaint with Supervisory Authority for the protection of personal data pursuant to Article 77 of GDPR.

According to section 2-l of Italian Privacy Code (*Restrictions on the rights of data subjects*) The rights referred to in Articles 15 to 22 of the Regulation may not be exercised by making a request to the controller or lodging a complaint pursuant to Article 77 of the Regulation if the exercise of those rights may prove factually, effectively detrimental to confidentiality regarding the identity of whistleblowers pursuant to Italian Law No 179 of 30 November 2017.

8. NOTICE UPDATE

Data Controller may update this notice.

Last update: 01/01/2021