

Body temperature measurement for passengers and operators using thermo-scanners

PRIVACY NOTICE

Pursuant to article 13, Regulation (EU) 2016/679 ("GDPR")

The provisions adopted at a national level to deal with the epidemiological emergency caused by COVID-19, applicable throughout the country, and the "Guidelines for information to users and organisational arrangements for the containment of the spread of COVID-19 in public transport" provide for specific measures for the air transport sector that must be observed for the containment of passengers and the proper use of air terminals and aircraft.

In addition, the "Guidelines for the resumption of traffic at airports, starting from "Phase 2" of the National Civil Aviation Authority (ENAC), provide for the installation by the airport operator of special control devices for measuring temperature.

In the vicinity of the terminal entrances or any case before the security gates, the body temperature of all persons entitled to enter the terminal, passengers, airport operators, State bodies must be measured.

In compliance with the provisions mentioned above, Aeroporti di Roma, in its capacity as an airport operator, has taken specific measures to combat and contain the spread of the virus within the terminals, including the introduction of specific instrumentation to measure the body temperature of operators and arriving and departing passengers.

In compliance with current legislation on privacy (EU Regulation 2016/679 - General Data Protection Regulation - "GDPR" - and D. Legislative Decree no. 196/03 and subsequent amendments and additions. (Personal Data Protection Code) Aeroporti di Roma, in its capacity as Data Controller, hereby wishes to provide some information to interested parties on the processing of personal data related to the measurement of body temperature using a thermo-scanner.

1. DATA CONTROLLER

In compliance with the Guidelines mentioned above for the containment of the spread of Covid-19 in public transport and the specific measures provided for the airport sector, Aeroporti di Roma S.p.A. (hereinafter referred to as "ADR"), proceeds through the use of thermal cameras (so-called thermo scanners, portable or possibly also installed in specific helmets, so-called. *smart helmet*, worn by authorised personnel, easily identifiable by the public) to the detection, in the vicinity of and inside the terminal access areas, of the body temperature of people entering and leaving the airport.

2. TYPES AND METHODS OF PROCESSING

Body temperature data is collected in real-time and is not recorded or stored further. If a temperature of more than 37.5° is detected, the staff in charge will only proceed to provide the person concerned with the instructions to be followed for the possible involvement of the competent health authorities. In compliance with the indications provided on this subject by the Italian Data Protection Authority, in no case will the person concerned be identified and the data recorded.

The temperature measurement is necessary for access to the terminal - and/or other related places - which could not take place otherwise, in compliance with the measures established for the air transport sector.

3. PURPOSE AND LEGAL BASIS OF PROCESSING

In carrying out the activities mentioned above, ADR processes the data relating to the measurement of body temperature for the purposes mentioned above of preventing and containing the spread of Covid -19 and for the implementation of specific measures to contain the infection foreseen for the air transport sector, following the provisions of the emergency regulations in force.

4. RECIPIENTS OF THE DATA

Only ADR Group staff and/or the competent health authorities present at the entrance areas and responsible for taking the person's body temperature will be aware of the data. Under no circumstances will the data collected be communicated to third parties. If a temperature higher than the permitted threshold is detected, the staff in charge will simply report the case to the competent health authority.

5. DATA TRANSFER OUTSIDE THE EU

The Data will not be disseminated and/or transferred to third parties located outside the European Economic Area.

6. DATA RETENTION PERIOD

The Personal Data will be subject to an instantaneous collection using the appropriate equipment (thermo-scanner and Smart Helmet) and will in no case be subject to registration and subsequent storage.

7. RIGHTS OF THE DATA SUBJECTS

The person concerned, whose temperature is detected, may, at any time, exercise his or her rights under the GDPR (Art. 15- 22) in so far as they are applicable concerning the type of processing carried out (mere collection without recording of data), including the right to object on specific grounds relating to a particular situation.

The rights mentioned above may be exercised vis-à-vis Aeroporti di Roma S.p.A., as Data Controller, with registered office at via Pier Paolo Racchetti 1,- 00054 Fiumicino (Rome), by contacting the Data Protection Officer or *Data Protection Officer* of ADR, at its registered office, and at the following address dpo@adr.it

The right of the person concerned to complain directly with the Data Protection Authority remains unaffected.

8. HOW TO CONTACT THE DATA PROTECTION OFFICER

The contact details of the *Data Protection Officer*, as well as the forms for exercising data subjects' rights, are available at www.adr.it.

The DPO can also be contacted by writing to the following address:

Data Protection Officer Data Protection Officer

(DPO)

Via Pier Paolo Racchetti, 1 00054 Fiumicino (RM)

9. CHANGES TO THE POLICY

The Data Controller reserves the right to amend and update this policy over time.