

PRIVACY POLICY PURSUANT TO ARTICLE 13 OF EUROPEAN REGULATION 679/2016 GDPR CONCERNING PROTECTION OF PERSONAL DATA

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

1. DATA CONTROLLER

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

2. DATA PROTECTION OFFICER

ADR has appointed a Data Protection Officer (“DPO”) contactable at the following e-mail address: dpo@adr.it.

3. TYPE AND METHOD OF PROCESSING

Pursuant to the principles enshrined in current regulations, personal data¹ processed are those voluntarily entered on the form available for submitting applications on the website www.adr.it/innovation and refer in particular to name, surname, and email address.

4. PURPOSE AND LEGAL BASIS FOR PROCESSING

The processing of personal data is carried out by ADR, upon your voluntary request, exclusively for the purpose of allowing the submission of applications relating to the Call For Startups and the possibility of being contacted by ADR to receive information material relating to these initiatives and/or an invitation to participate in future initiatives that will be organized subsequently.

The provision of data is necessary for the pursuit of the aforementioned purpose. If you refuse to consent to the processing of your data, it will not be possible to submit your request for application.

Furthermore, your contact details may be used to send you information and surveys on projects, innovation, services, and quality standards. You may object at any time by expressing your wish

¹ Personal data are understood under the GDPR as: “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, physiological, genetic, mental, economic, cultural or social identity of that natural person” (the “Data”). The GDPR defines special categories of personal data as those capable of revealing “racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, [...] genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.”

to stop receiving such communications via the link provided in the emails you receive, or by following the procedures set out in point 9 below.

The processing is necessary pursuant to Article 6, paragraph 1, letter b) of the GDPR for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures taken by the data subject.

5. PROCESSING METHODS

The data are processed in compliance with the regulations in force by means of IT and telematic tools, with logic strictly related to the purposes indicated, so as to guarantee the security and confidentiality of the data.

6. DATA RETENTION PERIOD

Personal data will be stored only for the time necessary for the purposes for which it is collected and processed in accordance with the principle of minimization pursuant to Article 5.1.c) of the GDPR.

In particular, personal data contained in requests for information and/or ideas referred to in this policy will be retained for the applicable limitation period starting from the conclusion of the procedure initiated by ADR for the Call For Startups – concerning the development of Proof of Concept as part of the Acceleration Program at Leonardo da Vinci International Airport in Fiumicino – unless further storage of the information is necessary in order to protect a right in court.

With particular reference to requests from authorities or the enforcement of legal obligations, or in the event of legal protection of our rights, the data will be stored for the time necessary to fulfill such obligations or requirements or to pursue the protection of our rights.

7. DATA RECIPIENTS

Only personnel responsible for receiving requests for information and/or ideas and authorized, in accordance with current legislation, to process personal data will have access to the personal data contained in the form.

Furthermore, if necessary, the data may be processed by third-party companies that provide support for the provision of services and/or for the operation of IT systems and appointed as external data processors pursuant to Article 28, paragraph 3 of European Regulation 679/2016 GDPR.

The data may be disclosed to the competent public authorities in compliance with legal obligations.

Under no circumstances will your data be disclosed.

8. TRANSFER OF DATA OUTSIDE THE EU

Personal Data will not be disclosed and/or communicated to third parties located outside of the European Economic Area.

9. RIGHTS OF THE DATA SUBJECTS

Data subjects may, at any time, exercise the following rights provided for in Articles 15 et seq. of the GDPR against ADR, as Data Controller: the right to access data concerning them, to rectify or integrate it if inaccurate, to portability, to erasure, to restriction of processing, where the conditions are met. The data subject also has the right to object to the processing. If the right to object is exercised, the Data Controller reserves the right not to comply with the request and therefore to continue the processing if there are compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject.

At any time, the data subject may request to unsubscribe from receiving information material and surveys by clicking on the unsubscribe link at the bottom of the emails received (opt-out).

In addition, the above rights may be exercised by sending a request to the Data Protection Officer (DPO) at the following address dpo@adr.it or by writing to the DPO at the following address: Via Pier Paolo Racchetti, 1 00054 Fiumicino (RM).

The right to lodge a complaint with the Data Protection Authority pursuant to Article 77 of the GDPR remains unaffected, where deemed necessary for the protection of one's rights in this regard.

The Data Controller reserves the right to update this policy.

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