

## NOTICE PURSUANT TO ARTICLE 13 OF EUROPEAN REGULATION 679/2016 GDPR CONCERNING PROTECTION OF PERSONAL DATA

With this notice, Aeroporti Di Roma S.p.A. (hereinafter also referred to as ADR) intends to provide you with the information pursuant to Article 13 EU Reg. 2016/679 (hereinafter referred to as 'GDPR') concerning the processing of personal data in connection with the submission of requests for information and/or ideas proposals by filling in the form available in the 'contact us' section on the *Innovation* page of ADR website.

### 1. DATA CONTROLLER

Aeroporti di Roma S.p.A. with registered office at Via Pier Paolo Racchetti, 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") who can be contacted at the following e-mail address: [dpo@adr.it](mailto:dpo@adr.it).

### 3. TYPES AND METHODS OF PROCESSING

In compliance with the principles sanctioned by the regulations in force, the personal data<sup>1</sup> subject to processing are those voluntarily entered on the form available for the submitting of requests for information and/or proposals of ideas on the ADR website and refer in particular to name, surname, e-mail address, role. To send requests it is necessary to fill in a text message to which it is possible to attach files in PDF format.

The user is not required to transmit any further information/personal data not inherent to the service. Any insertion of such data carried out completely freely and unconditionally (based on free consent art. 6.1, letter a, GDPR) and for purposes in line with the user's expectations, will follow the processing logics listed above.

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

---

<sup>1</sup> 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."

#### 4. PURPOSE AND LEGAL BASIS OF PROCESSING

The processing of personal data is carried out by ADR, upon your voluntary request, exclusively for the purpose of enabling the forwarding of requests for information and/or proposals of ideas and eventually for being contacted again by ADR to receive informational material and/or to be invited to participate in future initiatives that may be organized later.

The provision of the data is necessary for the pursuit of the aforementioned purpose; in the event of your refusal to provide the data, it will not be possible to forward requests for information and/or ideas.

Processing is necessary pursuant to Article 6.1 letter b) GDPR for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken by the data subject.

#### 5. PROCESSING METHODS

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

#### 6. DATA RETENTION PERIOD

Personal data will only be kept for as long as necessary for the purposes for which they are collected and processed in compliance with the principle of minimisation pursuant to Art. 5.1 letter c) GDPR. In particular, the personal data contained in requests for information and/or proposals of ideas referred to in this notice will be retained for the applicable prescriptive period unless further retention of the information is necessary to protect a right in court.

#### 7. DATA RECIPIENTS

The personal data contained in the form will be disclosed only to the personnel in charge of receiving requests for information and/or proposals for ideas and authorised, pursuant to current legislation, to process personal data.

The personal data contained in the form may be processed by third parties in their capacity as external data processors pursuant to Article 28, paragraph 3 of the European Regulation 679/2016 GDPR. Such Data may also be processed by the subjects the Data Controller has appointed to maintain and manage the IT platform used or physical archives.

In no circumstances the data will be subject to publication.

#### 8. TRANSFER OF DATA OUTSIDE THE EU

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

## 9. RIGHTS OF THE DATA SUBJECTS

The data subject may, at any time, exercise towards ADR, as the Data controller, the following rights provided for in Articles 15 et seq. of the GDPR: the right to access the data concerning him/her, to rectification if inaccurate, portability, erasure, restriction of processing, where applicable.

The data subject also has the right to object to the processing. In the event that the right to object is exercised, the Data Controller reserves the right not to follow up on the request, and therefore to continue processing, in the event that there are compelling legitimate reasons to proceed with processing that prevail over the interests, rights and freedoms of the data subject.

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

The above rights may be exercised by contacting the *Data Protection Officer* at the following e-mail address [dpo@adr.it](mailto:dpo@adr.it) or by writing to the attention of the DPO at the following address: Via Pier Paolo Racchetti, 1 00054 Fiumicino (Rome). The data subject has the right to lodge a complaint directly with the Italian Data Protection Authority pursuant to Article 77 GDPR.

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

Date of document update: June 2025