

Personal Shopper Privacy Policy

Pursuant to current privacy regulations (Articles 13 and 14 of European "GDPR" Regulation 2016/679 and Legislative Decree no. 196/03 and subsequent amendments and additions) the following information is provided in relation to the "PERSONAL SHOPPER" service, which allows passengers to request a shopping experience inside the "Tax Free Mall" at Fiumicino airport.

The service can be booked by calling +39 337 1161979 through WhatsApp, Kakao Talk, Wechat, Viber, Line, Telegram or alternatively by e-mail at the dedicated address personalshopper@adr.it

1. DATA CONTROLLER

Aeroporti di Roma S.p.A. with registered office in Via Pier Paolo Racchetti, 1 - 00054 Fiumicino (Rome), hereinafter also referred to as ADR or the Controller.

2. DATA PROTECTION OFFICER

ADR has appointed a Data Protection Officer. The contact details of the Data Protection Officer are available at www.adr.it.

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

ADR processes the user's personal data in order to enable the use of the Personal Shopper service. The data subject's voluntary request allows him/her to be contacted by the Personal Shopper team for a shopping experience inside the "Tax Free Mall" at Fiumicino airport.

The processing of the data is necessary to fulfil a request of the data subject by providing them with the requested service (Art. 6(1)(b) GDPR); in the event of a refusal to process the data, it will not be possible to provide the requested service.

In addition, based on the specific consent of the data subject (Art. 6(1)(b) GDPR), the contact data may be used by ADR in order to transmit via *e-mail* newsletters and commercial information regarding discounts, promotions, airport news and institutional initiatives. The granting of consent is optional and, in the event that consent to processing is not granted, the receipt of such information will not be activated. This does not, however, affect the possibility of using the Personal Shopper service.

The numbers and types of requests received from users - collected in aggregate and anonymous form - are used by ADR in order to improve the quality of the service.

Please note that the logics of subscription and use of social channels and/or messaging apps active to contact ADR and make use of the service are governed by the Policies defined by the managers of the communication channels (e.g., WhatsApp channels, Kakao Talk, Wechat, Viber, Line, Telegram) who act as data controllers pursuant to GDPR Articles 4 and 24.

4. TYPES OF DATA PROCESSED

The data processed by ADR includes contact details of the passenger requesting the service, such as: e-mail address and/or mobile phone number. ADR may also process the personal data of the passenger who intends to use the service as part of the management of the experience and/or services requested, such as name, surname, passport number, nationality, city of residence, flight number/date/destination.

The interested party may be contacted by ADR through associated channels such as: SMS, Whatsapp, Kakao Talk account, Wechat, Viber, Line, Telegram and/or e-mail address in the context of managing the experience and/or services requested.

With regard to the processing of personal data carried out by the managers of instant messaging channels/services used by Aeroporti di Roma, please refer to the information provided by the same through their respective privacy policies.

5. PROCESSING METHODS

The data are processed in compliance with the regulations in force by means of manual, IT and electronic tools, with logic strictly related to the above-mentioned purpose, so as to guarantee the security and confidentiality of the data.

6. DATA RETENTION PERIOD

Personal and contact data will be retained, in order to achieve the purposes for which they were collected in compliance with the principle of minimisation set forth in GDPR Art. 5.1 c). They will be retained for a period of 1 year after use of the service, without prejudice to ADR's option to retain them for a further period in the event of disputes and/or litigation.

Personal data processed for sending commercial and promotional communications will be retained until consent is revoked (opt-out) in the manner indicated in paragraph 9 below. In any case, we will periodically refresh your consent for this purpose in order to respect your choice.

The data will also be stored by the managers of instant messaging services (Whatsapp, Kakao Talk, Wechat, Viber, Line, Telegram). Please refer to the information provided by the latter through their respective privacy policies as autonomous data controllers pursuant to GDPR Articles 4 and 24.

7. DATA RECIPIENTS

Within ADR S.p.A., only the subjects appointed by the Data Controller and authorised to carry out processing operations on the activities above may become aware of the personal data you have provided.

Your data may be processed by the third-party company ACCENTURE S.p.A., which manages the *Sprinklr* platform for the optimisation of the Personal Shopper service and which, for this purpose, is appointed as Data Processor.

Data will also be processed by the managers of instant messaging services (*Whatsapp, Kakao Talk, Wechat, Viber, Line, Telegram*). Please refer to the information provided by the latter through their respective privacy policies as autonomous data controllers pursuant to GDPR Articles 4 and 24.

The data may be communicated to the competent Public Authorities, according to the requirements established by law. In any case, your personal data will not be transmitted.

Under no circumstances will personal data be disseminated.

8. NON-EU DATA TRANSFER

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

Please refer to what is defined by the operators of the instant messaging channels and the information provided by them through their respective privacy policies.

9. RIGHTS OF THE DATA SUBJECTS

Lastly, we would like to inform you that Articles 15-22 GDPR give data subjects the possibility of exercising specific rights under certain conditions.

Data subjects can obtain, from the Data Controller: access, rectification, deleting, limitation of processing, withdrawal of consent as well as the portability of data concerning them. Data subjects also have 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 proceed with the request and, therefore, to continue the processing, in the event that there are compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedom of the data subject.

The above rights may be exercised with a request sent without formalities to the Data Protection Officer (DPO) at dpo@adr.it.

The data subjects right to file a complaint with the Italian Data Protection Authority pursuant to Article 77, GDPR remains unaffected.

With reference to the processing for marketing activities, the data subject may at any time withdraw consent to receive commercial and promotional communications through the link available at the bottom of the e-mails received (opt-out) or, as for all the rights referred to above, by making an informal request to the DPO at dpo@adr.it.

The Data Controller reserves the right to update this policy.

Date of last update

August 2023