

## AERTRE S.P.A.

### PRIVACY NOTICE - PASSENGERS AND AIRPORT CUSTOMERS

As per Art. 13 of EU Regulation 2016/679 (GDPR), the company **AERTRE S.p.A.** with registered office in Via Noalese 63/E, Treviso, as **Data Controller**, (hereinafter "AERTRE" or "Controller") provides the following information for the data processed by the same: **passengers and customers of the Treviso Antonio Canova Airport.**

#### Data processing procedures



The data referred to in this Privacy Notice are processed on paper and electronically by AERTRE's internal staff, who are responsible for managing the individual tasks, and by staff of the SAVE Group's companies, to which AERTRE belongs, who provide intra-group services, as well as by external parties as shown in the table below with regard to each category of processing.

#### Automated decision-making / profiling



With the exception of what is expressly stated in the individual processing operations referred to in the table below, AERTRE does not carry out automated decision-making processes or profiling with the data acquired on the basis of this information notice.

#### Transfer of data to Third Countries

Any data transfer to Third Countries is performed as per Art. 44 and ff. of GDPR.

#### Granting and withdrawal of consent. Rights of the Data Subject

Except as expressly stated in the table below with regard to individual processing, the provision of data is required for the execution of the contractual relationship and/or legal obligation. Failure to provide the data will make it impossible to continue with the purposes indicated.



If specific consent is given to the processing of personal data, the person concerned may withdraw the consent itself without prejudice to the legitimate use of the data for the purposes of fulfilling the obligations resulting from the service provided during the period of consent.

The Data Subject has the right to request access their personal data, the rectification, erasure, limitation of such data, to object to the processing of their personal data, as well as the portability of their data, where this is possible.

#### Complaint to the Supervisor Authority



The Data Subject may lodge a complaint with a Data Protection Supervisor Authority, choosing between that of the EU State where they have their habitual residence, or in the EU State where they work or where the alleged violation has occurred.

#### Data Controller and Data Protection Officer (DPO) Contacts

To request the list of the offices and officers in charge of the processing, of the foreign Countries to which your data is transferred, the mechanisms and safeguards for the transfer of data pursuant to Art. 44 ff GDPR, to exercise the revocation of consent pursuant to Art. 7 GDPR as well as your other rights under EU Reg. 2016/679, you can write to:

**AERTRE S.p.A. Privacy Committee - Via Noalese 63/E, 31100 Treviso (Italy)**

**email: [privacy@grupposave.com](mailto:privacy@grupposave.com)**

Contact of the **SAVE Group's DPO** email: [dpo@grupposave.com](mailto:dpo@grupposave.com)

## List of processings made

DESCRIPTION OF THE DATA PROCESSED	PURPOSE OF THE PROCESSING, LEGAL BASIS AND CONSENT	PERIOD OF DATA RETENTION	SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED
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### 1. Video surveillance system (CCTV)

Images recorded by the video surveillance systems (CCTV) installed in the terminal and on the entire airport site.	<p>Organisational and production needs, workplace safety and security of airport areas, protection of company assets, prevention of offences.</p> <p>Legal basis: legitimate interest of the holder and legal obligations.</p>	The images are kept for 7 days, unless they are set aside for the protection of rights or for other legal reasons (in which case they are kept for the time necessary to carry out the purpose for which they were saved and, at the end of the same, for the further period of prescription of the law for defence in court, 10 years from the last use and/or event interrupting the prescription).	Company that manages airport security; air carriers; public bodies and law enforcement agencies; consultants; external lawyers; brokers and insurance companies; systems maintenance companies; third parties with the right to view images.
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### 2. Services to Passengers with Reduced Mobility (PRM)

Personal and special data where publicly declared (health) for passengers with reduced mobility.	<p>Operation of passenger services as requested and in accordance with PRM regulations.</p> <p>Legal basis: contractual and legal fulfilment and public interest obligations.</p>	The data are kept for the time necessary to perform the service and, then, for a further period of 7 years. In the event of a data claim, the data will be kept for the relevant period (see processing no. 4). After this period, the data will be kept anonymously for statistical purposes without any time restrictions.	Destination airports, air carriers; systems maintenance companies.
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### 3. Lost property and information

Identifying and contact data, special (health) data, or other data provided by the interested parties at the time of the event, by means of complaint reporting forms or suggestions.	Need to provide and manage the requested service, also in compliance with airport regulations.  Legal basis: Contractual obligation and legal obligation.	The data are kept for the time necessary to perform the service and, at the end of the same, for the further statutory prescription period relating to the retention of contracts and administrative data and/or for legal defence (10 years from the last use and/or event interrupting the prescription).	Public bodies and Police; external companies for the management of the sale or destruction of unclaimed items; systems maintenance companies.
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### 4. Service Charter and management of complaints, claims

Identifying and contact data, special (health) data, or other data provided by the interested parties at the time of the event, by means of complaint reporting forms or suggestions.	Need to respond to complaint/notifications and protection of the rights of the person concerned and the Data Controller, also in accordance with current airport regulations.  Legal basis: contractual legal obligations.	The data are kept for the time necessary for the purpose at the end of which for the further statutory prescription period for the retention of contracts and administrative data and/or for legal defence (10 years from the last use and/or event interrupting the prescription). After this period, the data will be kept in anonymous form for statistical purposes without time limitations.	Air carriers; airport sub-concessionaires; public bodies and law enforcement agencies; consultants; external lawyers; brokers and insurance companies; systems maintenance companies.
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### 5. General Aviation Airport Handling Services

<p>Personal data, payment data, flight data of general aviation passengers (private flights).</p>	<p>Management of general aviation handling services (private flights) and consequent management of the related airport activities.</p> <p>Legal basis: contractual obligation and legal obligation.</p>	<p>The data are kept for the time necessary to perform the service at the end which, for the further statutory prescription period relating to the retention of contracts and administrative data and/or for legal defence (10 years from the last use and/or event interrupting the prescription).</p>	<p>Assistance service companies (e.g. subcontractors); air carriers; public bodies and law enforcement agencies; system maintenance companies.</p>
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### 6. Ticket office and other services

<p>Personal data of passengers and travel data, payment data for certain services.</p>	<p>Provision of the service requested by passengers, also in compliance with the regulations on travel tickets and airports.</p> <p>Legal basis: contractual obligation and legal obligation.</p>	<p>The data are kept for the time necessary to perform the purpose and at the end of which, for the further statutory prescription period for the retention of contracts and administrative data and/or for legal defence (10 years from the last use and/or event interrupting the prescription). After this period, the data will be kept in anonymous form for statistical purposes without time limitations.</p>	<p>Air carriers; system maintenance companies.</p>
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### 7. Centralized airport management and maintenance services

Personal data of passengers and travel data.	<p>Management of "centralised" services (e.g. management of baggage handling systems) functional to airport activities and infrastructure maintenance services.</p> <p>Legal basis: contractual compliance, legitimate interest of the airport operator and legal obligations.</p>	<p>The data are stored for 30 days. For operational reasons or as a result of complaints, data may be stored for the time necessary for the performance of the purpose and, at the end of it, for the additional statutory prescription period for the retention of contracts and administrative data and / or for defense in court (10 years from the last use and / or event interrupting the prescription).</p>	Air carriers; maintenance companies.
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### 8. Emergencies

Personal and travel data of passengers, family members, operators and other users involved in emergency situations may be processed, including special (health) data.	<p>Safeguarding vital interests, airport safety and legal obligations in case of emergency.</p> <p>Legal basis: vital interests of the data subject or third parties and legal obligations.</p>	<p>The data are kept for the time necessary to perform the purpose and at the end of which, for the further statutory prescription period for the retention of contracts and administrative data and/or for legal defence (10 years from the last use and/or event interrupting the prescription).</p>	Air carriers; airport security company; public bodies and law enforcement agencies; providers of medical assistance services; suppliers of emergency services; other airport operators; consultants; external lawyers; brokers and insurance companies.
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### 9. Airport Health Service and sanitary measures

<p>Personal data of passengers, special (health) data, personal data of accompanying persons and travel data.</p>	<p>Safeguarding of vital interests in the event of a medical emergency, operation of the service requested by passengers at the airport rescue point., public interest and public health regulated by the laws (es: temperature check).</p> <p>Legal basis: vital interests of the data subject or third parties, public interest and legal obligations.</p>	<p>The data are kept for the time necessary to perform the purpose and for the specific period stated by the applicable law. Such data may be kept for longer periods in case of claims or accidents. This is without prejudice to longer periods for keeping medical records as prescribed by law.</p>	<p>Public authorities and law enforcement agencies; systems maintenance companies; airport security and sanitary staff. The same data could be autonomously processed by doctors and public health personnel (i.e. Red Cross, SUEM, 118, USMAF).</p>
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### 10. Ticket controls

<p>Data on boarding cards.</p>	<p>Verification of the ticket regularity under current airport regulations.</p> <p>Legal basis: contractual fulfilment and legal</p>	<p>The boarding card number, PNR and flight data are retained for 8 years.</p>	<p>Airport security company; public bodies and police; systems maintenance company.</p>
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#### 11. Commercial Aviation Airport Handling Services

<p>Personal data, payment data, flight data of passengers provided by the air carrier or by the passenger at the airport.</p> <p>In certain cases AER-TRE processes the data as data processor appointed by the air carrier.</p>	<p>Management of commercial aviation handling services and consequent management of the related airport activities.</p> <p>Legal basis: contractual obligation and legal obligation.</p>	<p>The data are kept for the time necessary to perform the service at the end which, for the further statutory prescription period relating to the retention of contracts and administrative data and/or for legal defence (10 years from the last use and/or event interrupting the prescription).</p>	<p>Assistance service companies (e.g. subcontractors); air carriers; public bodies and law enforcement agencies; system maintenance companies.</p>
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#### 12. Other processing of data in anonymous form

<p>Travel data and nationality of passengers NOT suitable to identify the subject, as derived from boarding passes read at airport points of sale.</p>	<p>Services improvement.</p>	<p>The data is stored anonymously without any time restrictions.</p>	<p>Consulting firms.</p>
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