

According to current privacy legislation (European Regulation 2016/679 "GDPR" and D. Legislative Decree no. 196/03 and subsequent amendments and additions), the following information is provided regarding the registration, access and use of the Aeroporti di Roma suppliers' register/portal.

1. DATA CONTROLLER

Aeroporti di Roma S.p.A. (ADR) with registered office at Via Pier Paolo Racchetti, 1 - 00054 Fiumicino (Rome).

2. DATA PROTECTION OFFICER

ADR has appointed a Data Protection Officer (DPO), who can be contacted at the following email address: dpo@adr.it for the exercise of data subjects' rights under Articles 15 to 21 of the GDPR.

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

As part of the administration of the supplier portal, ADR processes personal data on representatives/employees of suppliers who register and provide company identification and contact data (names, email and telephone numbers). Registration results in creating an account on the portal with access via username and password.

Suppliers may also qualify to participate in certain types of selection by filling in a detailed questionnaire requesting only corporate information about the legal entity and the indication of a contact person (personal and contact details).

The data entered will be processed by ADR to ensure registration in the supplier register and the related services requested. Therefore, data are processed in the execution of pre-contractual measures (Art. 6(1)(b) GDPR).

The provision of personal data and processing of such data is essential for the provision of the Register/Purchasing Portal service. All data collected as part of the processing are necessary and strictly functional for the provision of the service itself. Therefore, failure to provide the data would make it impossible to provide the Register/Purchasing Portal service and carry out subsequent activities.

If personal data referring to other persons is included in the registration, ADR collects the data from these persons under Article 14 of GDPR. By taking note of this Information Notice, the person who registers through the appropriate "form" declares: (i) to undertake to duly inform the persons concerned about the communication of data to ADR for the request in question and to inform them about the content of this notice; (ii) to expressly indemnify ADR from any liability deriving from the unlawful communication of said data.

4. TYPES OF DATA PROCESSED

The data processed by ADR include personal data of a common type (i.e. contact details of supplier representatives) such as first name, surname, email address, and telephone number.

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.

The data will not be subject to automated decision-making and profiling processes.

6. DATA RETENTION PERIOD

Personal Data will only be kept for as long as necessary for the purposes for which they are collected and for the subsequent applicable prescriptive period in compliance with the principle of minimisation pursuant to GDPR Art. 5.1.c). As far as registration is concerned, for exclusively registered suppliers, the account is disabled 24 months after registration in the event of non-interaction, upon receipt of a *reminder* notice. For qualified suppliers, qualification expires after three years. If the qualification is not renewed, the account is disabled after 24 months, subject to a *reminder*.

7. DATA RECIPIENTS

Within ADR S.p.A., only persons authorised by the Data Controller to carry out processing operations may become aware of the data you have provided.

Moreover, your data may be processed only by third party companies to which ADR may entrust specific activities and services related to the management of the portal.

In particular, your data may be processed by the entities the Data Controller uses to maintain and manage the register/portal in its capacity as External Data Processor under Article 28 GDPR (i.e. BRAVOSOLUTION ITALIA S.p.A.).

The data may be communicated to the competent public authorities in order to comply with legal obligations.

In any case, your personal data will not be disseminated.

8. NON-EU DATA TRANSFER

Data may be transferred to countries belonging to the European Economic Area or third countries outside the EEA within the limits of and in compliance with Chapter V of the GDPR on transferring personal data to third countries.

9. RIGHTS OF THE DATA SUBJECTS

Lastly, please be informed that Articles 15-22 of the GDPR give data subjects the possibility to exercise 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.

The Data Controller reserves the right to update this policy.

Last updated August 2022