

## Privacy Policy

Pursuant to Articles 13 - 14 of the European Regulation 2016/679 ("GDPR")

Pursuant to current privacy legislation (European Regulation 2016/679 "GDPR" and Legislative Decree no. 196/03 and subsequent amendments and additions) the following privacy policy is provided regarding the processing of personal data processed to receive newsletters and commercial information on discounts, promotions, airport news and institutional initiatives by **Aeroporti di Roma S.p.A.** (hereinafter, "**ADR**" or the "**Controller**").

### 1. DATA CONTROLLER

Aeroporti di Roma S.p.A. with registered office in via Pier Paolo Racchetti 1 - 00054 Fiumicino (Rome).

### 2. DATA PROTECTION OFFICER

ADR has appointed a Data Protection Officer, pursuant to Article 37 of the GDPR, who can be contacted at the following e-mail address: [dpo@adr.it](mailto:dpo@adr.it).

### 3. TYPES OF DATA PROCESSED

In compliance with the principles established by the regulations in force, the personal data<sup>1</sup> being processed refer in particular to name, surname, e-mail address.

### 4. PURPOSES AND LEGAL BASIS OF THE PROCESSING

Data processing is carried out by Aeroporti di Roma S.p.A., subject to the acquisition of express and specific consent, for the purpose of sending newsletters and commercial information regarding discounts, promotions, airport news and institutional initiatives.

Marketing communications may take place through automated contact methods (e-mail).

The legal basis for the processing is express consent (pursuant to Art. 6.1 letter a, GDPR).

The provision of data is optional for this purpose; if consent is not given, you will not receive commercial and promotional communications.

The data subject may withdraw consent (opt-out) at any time by the specific link accessible from the e-mail communications received, as well as by means of the procedures set out in paragraph 9 below.

### 5. PROCESSING METHODS

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.

### 6. DATA RETENTION PERIODS

In compliance with the principle of minimisation ex art. 5.1, letter c) GDPR, data will be kept only for the time necessary to pursue the purposes for which they were collected.

For the sending of commercial and promotional communications, personal data will be processed as long as the user uses the services, except in the event of withdrawal of consent and/or opposition to processing (opt-out) in the manner indicated in paragraph 9 below.

With particular reference to requests from the authorities or the fulfilment of legal obligations, or in the event of legal protection of our rights, the data will be kept for the time necessary to fulfil such obligations or fulfilments or to pursue the protection of our rights.

### 7. DATA RECIPIENTS

Within ADR, only the subjects appointed by the Data Controller and authorised to carry out processing operations on the aforementioned activities may become aware of the personal data provided. Moreover, the data may only be processed by third party companies appointed, if necessary, as data processors, who provide support for the provision of the Services and/or for the operation of the IT systems.

It is possible to contact ADR at the following address [dpo@adr.it](mailto:dpo@adr.it), to ask to see the list of data processors and other subjects to whom the data is communicated.

The data may be communicated to the competent Public Authorities in compliance with legal obligations.

In any case, the data will not be disclosed.

### 8. DATA TRANSFER OUTSIDE THE EEA

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

### 9. DATA SUBJECTS RIGHTS

Data subjects may, at any time, exercise the following rights towards ADR, as the data controller, under Articles 15 and following of the GDPR: the right to access the data concerning them, to rectification or integration 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 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. With reference to processing for marketing activities, it is possible to withdraw consent without prejudice to the lawfulness of the processing carried out prior to the withdrawal. At any time, the data subject shall have the right to withdraw their consent to receive commercial and promotional information through the link available at the bottom of the e-mails received (opt-out).

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<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".

The above rights may be exercised by making a request addressed without formalities to the Data Protection Officer (DPO) at [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).

Furthermore, the right to lodge a complaint with the Data Protection Authority pursuant to Art. 77 GDPR shall remain unaffected where deemed necessary for the protection of one's rights in the matter.

The Controller reserves the right to update this privacy policy.

Date of last update

June 2025