

Policy on the processing of personal data related to the
Shop&Fly service
pursuant to Articles 13 – 14 of European Regulation 2016/679 (“GDPR”)

Dear Passenger,

pursuant to Articles 13 and 14 of European Regulation 2016/679 (“GDPR”), **Aeroporti di Roma S.p.A.**, acting as data controller, (hereinafter, “**ADR**” or the “**Data Controller**”), provides you with the following information relating to the processing of your personal data processed as part of the “*Shop & Fly*” service through which the passenger can, by consulting the online catalogue, order the products that can be purchased at the shops of Leonardo da Vinci International Airport of Fiumicino (hereinafter, the “*Airport*”).

The “*Shop & Fly*” service is hereinafter defined as the “**Service**”.

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, GDPR, who can be contacted at the following e-mail address: dpo@adr.it.

3. TYPES OF DATA PROCESSED

The Data Controller processes your personal data collected directly from you, by filling out the online *form* to activate the service (hereinafter jointly “**Data**”):

- Data relating to the flight, information relating to the date, time and flight number to consult the goods that can be booked based on the destination (Schengen or Non-Schengen) and allow the system to automatically set the relevant Shop;
- Personal and contact details: information such as name, surname, e-mail;
- Language preference.

4. PURPOSES AND LEGAL BASES OF THE PROCESSING

ADR processes your data for one or more of the following purposes, in consideration of the legal basis indicated in each case.

1) **Management of the service “Shop & Fly”**: ADR processes your Data to fulfil your order request for catalogue products, to send you service communications (for example, to report anomalies or the out-of-stock of the booked product, send you confirmations, links and information for finalising the purchase at the shop). Furthermore, after using the Service, the user will receive a service e-mail from ADR containing the options to voluntarily express satisfaction levels/provide a review/give feedback.

The legal basis of the processing is the performance of a contract to which you are party pursuant to Article 6.1, letter b) of the GDPR.

The provision of Data is necessary for the use of the “*Shop & Fly*” Service and the refusal to provide such Data will make it impossible to use the Service itself.

2) **Marketing**: with your prior express and specific consent, ADR will process your Data to send you commercial/promotional information and/or surveys relating to discounts, promotions, news at the airport and institutional initiatives.

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

In this regard, you may object to receiving promotional communications through every or only some of these contact methods.

The legal basis of the processing is your consent given pursuant to article 6.1, letter a) of the GDPR.

The provision of data is optional for this purpose, in the event of failure to consent to the processing, you will be able to use the Service without suffering any prejudice, but you will not receive commercial and promotional communications. You may withdraw your consent (opt-out) at any time through the appropriate link which can be accessed from the e-mail communications received, as well as through the methods referred to in point 9 below.

3) **Purposes associated with the obligations established by laws, regulations or european legislation, by provisions / requests of authorities legitimised to do so by law and/or by supervisory and control bodies**: ADR will process your Personal Data to comply with its legal obligations.

The legal basis of the processing is the compliance with a legal obligation, pursuant to article 6. 1, letter c) of the GDPR.

The provision of your Data for these purposes is mandatory, given that, otherwise, the Data Controller will be unable to comply with specific legal obligations.

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 PERIODS

In compliance with the principle of minimisation pursuant to Article 5.1, letter c) of the GDPR, your Data will be retained only for the time necessary to pursue the purposes for which they were collected or for any other legitimate related purpose. Therefore, if the data are processed for two different purposes, we will retain such data until the purpose with the longer term ceases. In any case, we will no longer process personal data for those purposes whose retention period has expired.

Data that are no longer necessary, or for which there is no longer a legal basis for their retention, are irreversibly anonymised (and in this way they can be stored) or destroyed in a secure manner.

The processed Data will be stored no longer than 5 years from the order of the product, in compliance with the prescription periods set out by law.

Regarding 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 objection to processing (opt-out) in the manner specified in section 9 below.

With specific reference to requests from authorities or the performance of legal obligations, or in the case of judicial protection of our rights, your Data will be retained for the time necessary to carry out such obligations or fulfilments or to pursue the protection of our right.

7. DATA RECIPIENTS

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

It is possible to contact ADR at the following e-mail address dpo@adr.it, to request to view the list of data controllers and other subjects to whom it communicates Data.

Furthermore, in order to finalise the purchase and payment of the goods ordered, ADR - through the dedicated tool - will make the personal data of users who use the *Shop & Fly* service available to LS TRAVEL RETAIL ROMA S.r.l. in order to allow the latter to manage the sale/purchase process as the sole and exclusive legal entity responsible and data controller of the processing of personal data.

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

In any case, your Data will not be subject to dissemination.

8. DATA TRANSFER OUTSIDE THE EU

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

9. RIGHTS OF THE DATA SUBJECTS

Lastly, we inform you that you have the right to ask ADR, subject to the existence of the legal prerequisite underlying your request:

- Data access, pursuant to article 15, GDPR;
- Rectification or integration of inaccurate Data held by ADR, pursuant to article 16, GDPR;
- Erasure of Data for which ADR no longer has a legal prerequisite for the processing, pursuant to article 17, GDPR;
- The restriction of the way Data are processed, if one of the hypotheses provided for in article 18, GDPR occurs;
- A copy of the Data provided to ADR, in a structured, commonly used and machine-readable format and the transmission of such data to another data controller (so called, portability), pursuant to article 20, GDPR;
- The withdrawal of your consent at any time, in the event that the processing is based upon consent. It should be noted that any withdrawal of consent shall only have effect with regard to subsequent processing, and shall not affect the lawfulness of the processing previously carried out prior to such withdrawal.

Right to object: in addition to the rights listed above, you may object to the processing at any time. In the event that the right to object is exercised, the Data Controller reserves the right not to follow up on your request, and thus to continue processing, if there are compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject.

With regard to processing for marketing activities, you may at any time withdraw your consent to receiving commercial and promotional information via the link available at the bottom of the e-mails you receive (opt-out) or, as well as for all the above-mentioned rights, by making a request addressed without formalities to the Data Protection Officer (DPO) at dpo@adr.it.

This is without prejudice to your right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) pursuant to Article 77 of the GDPR, using the references available on the website www.garanteprivacy.it/web/garante-privacy-en/home_en, or to take legal action.

The Data Controller reserves the right to update this policy.

With reference to any subsequent purchase of products and the related payment, which may be made directly at the shops managed by LS TRAVEL RETAIL ROMA S.r.l., please refer to the policy provided by LS TRAVEL RETAIL ROMA S.r.l. pursuant to and in accordance with Articles 13 and 14 of the GDPR, available here <https://www.lagardere-tr.it/en/shopfly>.

Date of last update

March 2024