

## Privacy Policy Italo Loyalty Programme

- **INFORMATION NOTICE RELATED TO PERSONAL DATA PROCESSING REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016**

Pursuant to and for the effects of article 13 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on free movement of such data, and repealing Directive 95/46/EC (“General Data Protection Regulation” or simply “Regulation” or “GDPR”), we inform you that ITALO - Nuovo Trasporto Viaggiatori S.p.A. (ITALO) collects and processes Your personal data in compliance with data protection law in force and, in any case, in accordance with the principles of confidentiality that our Company is inspired by.

1. Categories of personal data processed

ITALO will process the following categories of personal data provided by You:

- Personal data, such as, for example, name, surname, date of birth, gender, password, invitation code (only Italo Più), e-mail (Italo Più), business e-mail (Italo Più Corporate), phone number, address, and, if necessary, copy of ID card (below also “Personal Data” or “Data”).

2. Purposes of the processing activities

Your Personal Data will be processed by ITALO for the following purposes:

- a. to allow and to manage Your membership to the loyalty program named “Italo Più” or “Italo Più Corporate” (below also briefly “the Program”);
- b. to allow You to use products and/or services, as well to carry out the activities reserved for You by virtue of Your subscription to the Program;
- c. administrative and accounting purposes and for the fulfillment of obligations established by current legislation;
- d. for marketing purposes, in consequence to Your eventual and specific consent, such as: for the sending of informative and commercial communications, including promotional (such as our newsletter), advertising material and/or offers of goods and services of ITALO and ITALO’s partners, by any means, including but not limited to, e-mail, internet, phone, MMS, SMS from Italy or from abroad (also from countries not belonging to European Union) by ITALO, parent companies, subsidiaries and/or participated by it, as well as by physical or legal entities linked contractually to ITALO that send communications by name and account of ITALO;
- e. for profiling purpose, following Your eventual and specific consent, to allow the elaboration and execution of market studies and research, as well as for the analysis of the preferences, habits, needs and customer choices and in order to receive personalized offers based on purchasing preferences, by ITALO, parent companies, subsidiaries and/or participated by it, as well as by physical or legal entities linked contractually to ITALO that cooperate in commercial activities by name and account of ITALO;
- f. following its possible and specific consent, for the transfer of data to ITALO

commercial partners for the purpose of receiving their communications.

We remind You that, with reference to the purposes specified in points a), b) and c), the provision of Your Personal Data is mandatory.

Your refusal and/or the provision of inaccurate and/or incomplete information would prevent:

- with reference to the purpose a): Your registration in the loyalty program named “Italo Più” or “Italo Più Corporate”;
- with reference to the purpose b): from using products and/or services, as well from carrying out of the activities reserved for You by virtue of Your subscription to the Program;
- with reference to the purpose c): for Italo, the execution of the administrative and accounting activities and the correct fulfillment of regulatory obligations.

In particular, we inform you that ITALO may request a copy of Your identity card in order to verify the correctness of the data referring to you in the event, by way of example, of a request, received by you, of rectification of the personal data provided when registering for the Program.

With reference to the other purposes specified in points d), e) and f) the provision of Your Personal Data and the consent to the processing of the same for the aforementioned purposes, is optional. However, your refusal and/or the provision of inaccurate and/or incomplete information would prevent ITALO:

- with reference to the purpose d): the sending of promotional communications by ITALO;
- with reference to the purpose e): profiling activities and the sending of personalized offers based on Your personal purchase preferences by ITALO;
- with reference to the purpose f): the transfer of Your personal data to ITALO’s commercial partners for the purpose of receiving their communications.

In this regard, with reference to the purposes specified in points d), e) and f), we remind you that any change to your consents will be effective on our systems within a period of 7 days from the time of your request.

### 3. Methods of the processing activities

In relation to the purposes indicated, Your personal data will be processed by suitable paper-based, electronic and/or Web-based instruments with logic strictly related to the aforesaid purposes and, in any case, such as to ensure data security and confidentiality.

In the event that the user (i) logs in or signs up for ITALO services via login credentials of a social network (such as Facebook or Twitter) or (ii) associates his/her own account to an account of the same user on a social network, ITALO can receive from this social network user-related data, in accordance with the conditions provided in the privacy policy of the social network itself. ITALO can

add these information to User Data already collected through its services. If the user opts for sharing information with these social networks, ITALO receives that data from them in accordance with all the consent options given by the user. Any personal data communicated by social network will be subject to terms and conditions of use of the social network.

#### 4. Recipients or categories of recipients of the personal data

Members of the Board of Directors, the Data Protection Officer and, in any case, and all persons acting under the authority of the Data Controller, authorized to processing activities may be aware of Your personal data during the execution of their duties.

Your Personal Data may be communicated to other subjects who provide ITALO services or instrumental services to the purposes indicated in the previous paragraph 2 such as, for example, parent companies, subsidiaries and / or affiliates.

Your Personal Data may also be communicated to suppliers, contractors, subcontractors, banking and/or insurance companies or other entities and/or entities that manage or participate in (on behalf of ITALO):

- management and/or maintenance of websites and electronic and/or telematic tools used by ITALO;
- management of the registration to the loyalty program called "Italo Più" or called "Italo Più Corporate";
- sending information and promotional communications, including commercial communications, advertising material and/or offers of goods and services;
- carrying out profiling activities, including the detection of habits, preferences and consumer choices, as well as the development and completion of studies and market research.

Your Personal Data may possibly be transferred abroad, in accordance with the provisions of current legislation, even in countries outside the European Union where the Company possibly pursues its own interests.

The transfer to countries outside the EU, in addition to cases in which this is guaranteed by the adequacy decisions of the European Commission, is carried out in such a way as to provide appropriate and guarantees pursuant to articles 46 or 47 or 49 of the Regulation 679/2016.

#### 5. Duration and criteria used to determine the period for which the personal data will be stored

##### 5.1 Duration

For the purposes a), b), c) and d) referred to in paragraph 2 "Purposes of Processing activities" of this information notice, your Personal Data will be processed only for the time strictly necessary, not exceeding that necessary for the fulfillment of the legal obligations.

For the purposes of marketing, profiling and communication to ITALO commercial partners referred to in letters d), e) and f) of paragraph 2 "Purpose of

the Processing" of this information notice, your Personal Data will be processed until the revocation of consent from the data subject.

## 5.2 Retention period

Your Personal Data will be stored in accordance with the following criteria:

- the Data processed for purposes related to your registration to the Program with reference to letters a), b) and c) of paragraph 2 "Purposes of Processing activities" of this information notice, will be kept for a period of 10 years following the termination of your commercial relationship with ITALO, unless the need for further conservation arises, to allow ITALO to defend its rights;
- the Data processed for purposes of marketing and profiling as per letter d), e) and f) of paragraph 2 "Purpose of the Processing activities" of this information notice, will be kept for a maximum period of 24 months;

## 6. Data subject's rights

We would like to inform You that at every time You could exercise Your rights according to Article 7 and Articles 15-22 of GDPR 2016/679. To exercise Your rights, You can contact the Data Controller at [privacy@ntvspa.it](mailto:privacy@ntvspa.it). To Your request, the Company will give You a feedback without delay within 30 days. You have the right to:

- revoke the consent previously given, without prejudice to the lawfulness of the processing based on consent before the revocation;
- request from the Data Controller access to or rectification or erasure of personal data ("right to be forgotten") or the restriction of processing concerning You or to object to processing;
- obtain data portability;
- lodge a complaint with the competent supervisory authority.

## 7. Data Controller and Data Processor for processing activities

The Data Controller is ITALO – Nuovo Trasporto Viaggiatori S.p.A., with registered office in Via Casilina, no. 1, Rome, Italy, in the person of Legal Representative. Any request relating to the personal data processed by ITALO - Nuovo Trasporto Viaggiatori S.p.A. may be sent to the company's registered office or to its email [privacy@ntvspa.it](mailto:privacy@ntvspa.it).

The updated list of Data Processors is made available by the Company and may be obtained upon a specific request submitted as detailed above.

The Data Protection Officer's contacts is [dpo@ntvspa.it](mailto:dpo@ntvspa.it)

This privacy information notice could be updated. ITALO invites You to periodically visit this page in order to know how ITALO processes Your Data.

Data Controller

ITALO – Nuovo Trasporto Viaggiatori S.p.A.