

Sign-up on the www.trenitalia.com

website to gain access to and use the Customer Area on the Trenitalia website and app Personal Data Protection Policy

Articles 13 and 14 of European Regulation No. 679/2016

Before acquiring the personal data required for you to sign up on the Trenitalia website: www.trenitalia.com, Trenitalia invites you to carefully read the policy regarding personal data protection.

I. Data Controller and Data Protection Officer

Below are our main contact persons in relation to the processing of personal data:

- Data Controller: Trenitalia S.p.A., with registered office in Piazza della Croce Rossa 1 – 00161 – Rome, Italy, represented by the pro-tempore Chief Executive Officer, can be contacted at: titolaretrattamento@trenitalia.it,
- Data Protection Officer: The Data Protection Officer (DPO) for Trenitalia S.p.A. can be contacted at the following email address: protezionedati@trenitalia.it

II. Types of personal data

The personal data being processed fall into the following categories:

- The minor's data acquired during the sign-up process (mandatory): First name, surname, Tax Identification Number (only for those who do not have an Italian tax code: Country of birth, date of birth), contact details (email).
- The minor's data acquired during the sign-up process (optional): contact details (mobile phone number).
- The minor's data that has been automatically acquired (mandatory): data relating to the journey undertaken (train tickets, services purchased).
- Data of the declarant parent/guardian of the minor (mandatory): Personal Data (first name and surname).

The aforementioned data will be processed using electronic and paper-based formats in order to guarantee suitable measures of security and privacy.

III. Purpose of Data Processing

I Personal data will be processed for the following purposes:

- a) Signing up on the website www.trenitalia.com to gain access to and use of the Customer Area on the website and the Trenitalia app, which allows members to take advantage of certain benefits, such as faster purchasing of your favourite journeys, viewing your purchase history, easily managing your purchased tickets (e.g. for compensation claims), saving your travelling companions or saving an invoice profile with a specific tax code so you can quickly retrieve this information when you make your next purchase); Nature of the provision: Mandatory; Legal basis: Contractual;
- b) Promotional and marketing activities by Trenitalia relating to the services of Trenitalia or its Partners. Nature of data provision: Optional. Legal basis: Consent granted during the sign-up process or in the Customer Area;
- c) Profiling activities by Trenitalia: Nature of data provision: Optional. Legal basis: Consent granted during the sign-up process or in the Customer Area;
- d) The transfer of data to Trenitalia France S.A.S to facilitate promotional and marketing activities by Trenitalia France relating to services offered by Trenitalia France or its Partners from France; Nature of the provision: Optional; Legal basis: Consent granted during the sign-up process or in the Customer Area.

Provision of the data necessary for the purpose referred to in point a) is "mandatory" and any refusal would make it impossible for Trenitalia to facilitate the sign-up process on the Trenitalia website: www.trenitalia.com. The provision of the data necessary to pursue the purpose referred to in point b) is "optional" in nature; therefore, refusal to provide them will not lead to restrictions on the services provided, but will result in the registered user not receiving any informational, advertising and promotional material or customer satisfaction surveys by Trenitalia relating to services offered by Trenitalia or its Partners. The provision of the data necessary to pursue the purpose referred to in point c) is "optional" in nature; therefore, refusal to provide such data will not lead to restrictions on the services provided, but it will prevent Trenitalia from identifying travel habits and consumer choices for the purpose of offering services that are in line with the personal preferences of the user.

The provision of the data necessary to pursue the purpose referred to in point d) is "optional" in nature; therefore, refusal to provide such data will not lead to restrictions on the services provided, but it will prevent Trenitalia from transferring your data to Trenitalia France for the purposes of sending you informational, advertising and promotional material relating to services that Trenitalia France or its Partners offer from France.

Any consent given with regard to the purposes outlined in b), c) and d) may be freely withdrawn at any time, without prejudice to the lawfulness of the processing of data carried out before its withdrawal. Consent can be withdrawn by accessing your Customer Area on the website www.trenitalia.com (“Modify details” section), or by contacting the Data Protection Officer at the following email address: protezionedati@trenitalia.it.

IV. Persons authorised to process personal data

Your personal data will only be made accessible to persons who have been authorised to process data within Trenitalia. These individuals will be properly instructed in order to avoid the loss of the personal data and to prevent unauthorised parties from accessing the data or from carrying out unauthorised processing of the data itself. Furthermore, your data may be processed by companies that carry out activities on behalf of Trenitalia, including IT Services companies. These companies act as Data Processors on behalf of Trenitalia, and have signed a specific contract that duly regulates the processing entrusted to them and their obligations regarding data protection. Your data will never be disseminated. Finally, your personal data may be transmitted to other independent data controllers in accordance with applicable laws or regulations (Judicial authorities, Law enforcement authorities).

Only if you have granted your consent may your data be transmitted to Trenitalia France in order for it to send you informational, advertising and promotional material relating to the services provided by Trenitalia France or other Partners from France. The Trenitalia France policy can be viewed on the website: www.trenitalia.com/trenitalia-france.html.

The up-to-date list of the persons and companies who are authorised to process data is available by contacting the email address: areaclienti@trenitalia.it, or by contacting the Data Protection Officer at the email address: protezionedati@trenitalia.it.

V. Personal data storage

Below are the storage times for your personal data by Trenitalia:

- For the purposes outlined in point III. a) of this policy, which make the provision of data mandatory: after 10 years of User inactivity (lack of purchases).
- For the purposes outlined in points III. b) and III. c), which make the provision of data optional: data relating to the specific details of purchases shall be stored for marketing or profiling purposes for a period not exceeding 24 and 12 months, respectively, from their initial date of registration, unless they are rendered anonymous.

VI. Rights of the data subjects

EU Regulation 2016/679 (Articles 15 to 23) grants data subjects the option to exercise specific rights. In particular, in relation to the processing of your personal data, you have the right to ask Trenitalia for access to or the rectification, erasure, limitation or portability of your personal data, or to object to processing. In addition, you may lodge a complaint with the Supervisory Authority which, in Italy, is the Data Protection Authority.

You may request to exercise your rights at any time, by contacting Trenitalia via the following email address: areaclienti@trenitalia.it, or by contacting the Data Protection Officer at this email address: protezionedati@trenitalia.it.

VII. Automated decision-making process and profiling

Trenitalia uses profiling to identify the travel habits and consumer choices of its users, in order to provide services that are in line with customer preferences. This process of profiling involves the analysis of your travel habits in the last 12 months (favourite destinations, average distance travelled, monthly costs incurred, etc.) and it may also entail behavioural advertising and personalised offers.

However, it is possible to oppose such data processing, through the channels outlined in Section VI of the present Policy.

Authorisation to process the personal data of minors under 18 years of age and consent

I, the undersigned..... as the parent/guardian of my child/minor in my care.....
authorise Trenitalia S.p.A. to process the personal data of the minor in question for the purposes specified in this Policy and grant/deny consent as follows.

For the processing of “optional” data (as specified in paragraph III. section b) - “Purpose of Data Processing”):

- I, hereby, give my consent to the processing of data related to my child/minor in my care by Trenitalia in order to send information, advertising, promotional material and customer satisfaction surveys relating to the services provided by Trenitalia or its Partners. This material may be sent via both automated means (email, SMS/MMS, app notifications, the Internet) and traditional methods (post, telephone).
- I, hereby, do not give my consent to the processing of data related my child/minor under my care by Trenitalia in order to send information, advertising, promotional material and surveys on the level of customer satisfaction relating to the services provided by Trenitalia or its Partners.

For the processing of “optional” data (as specified in paragraph III. section c) - “Purpose of Data Processing”):

- I, hereby, give my consent to the processing of data related my child/minor under my care by Trenitalia in order to be included in profiling activities which involve recording travel habits and consumer choices, in order for Trenitalia to create and schedule offers that are in line with its customers’ preferences.
- I, hereby, do not give my consent to the processing of data related my child/minor under my care by Trenitalia in order to be included in profiling activities which involve recording travel habits and consumer choices, in order for Trenitalia to create and schedule offers that are in line with its customers’ preferences.

For the processing of “optional” data (as specified in paragraph III. section d) - “Purpose of Data Processing”):

- I, hereby, give my consent to the processing of data related to my child/minor under my care by Trenitalia France to send information, advertising and promotional material relating to the services provided by Trenitalia France or its Partners from France by email or SMS/MMS.
- I, hereby, do not give my consent to the processing of data related to my child/minor in my care by Trenitalia France to send information, advertising and promotional material relating to the services provided by Trenitalia France or its Partners from France by email or SMS/MMS.

The consent granted for the abovementioned purposes may be freely withdrawn at any time, without prejudice to the lawfulness of the data processing carried out before withdrawal.

Date Signature