

INFORMATION ON THE PROCESSING OF PERSONAL DATA
(ART. 13 OF EU REGULATION 2016/679)

The current legislation on the processing of personal data defined in accordance with the requirements contained in the EU Regulation No. 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, in the following "EU Privacy Regulation" or "GDPR") contains provisions aimed at ensuring that the processing of personal data is carried out in compliance with the fundamental rights and freedoms of natural persons, with particular regard to the right to protection of personal data.

1. Purpose of processing

Personal data is processed for the purpose of carrying out activities related to participation in the prize competition.

2. Types and storage of processed personal data

Within the limits of the purposes set out above, the Controller will process personal data concerning first name, last name, e-mail address and home address in order to send the prizes.

This data will be stored for 5 (five) years.

Any processing of sensitive data by the Controller shall be based on the prerequisites set out in Article 9.2 lett. a) of the GDPR.

3. Data processing

For the purposes of transparency and in compliance with the principles set out in Art. 12 of the GDPR, please note that 'processing of personal data' means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The processing of personal data may be carried out with or without the aid of electronic or automated means and will also include, in compliance with the limits and conditions laid down by the GDPR, communication to the entities referred to in point 7 below.

4. Modalities of data processing

The personal data being processed are:

- a. processed lawfully and fairly by persons authorized to perform such tasks, persons who are constantly identified, appropriately instructed and made aware of the constraints imposed by the GDPR;
- b. collected and recorded for specified, explicit and legitimate purposes, and used in other processing operations in terms compatible with those purposes;
- c. exact and, if necessary, updated;
- d. relevant, complete and not excessive in relation to the purposes for which they were collected or subsequently processed;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which they were collected or subsequently processed;
- f. processed with the support of paper, computer or telematic means and with the use of security

measures to guarantee the confidentiality of the data subject to whom the data refer and to prevent undue access by third parties or unauthorized personnel.

5. Nature of conferment

The provision of certain personal data is necessary.

In the event of failure to provide the requested personal data or in the event of opposition to the processing of the personal data provided for the purposes referred to in Article 1, the Owner will not be able to manage the activities connected with the prize competition.

6. Rights of the data subject

Pursuant to articles 15-20 of the GDPR, the user will be able to exercise specific rights, including that of obtaining access to personal data in an intelligible form, rectification, updating or deletion of the same. He/she will also have the right to obtain from Trenord the limitation of the processing, he/she may also oppose for legitimate reasons the processing of the data. In the event that the user considers that the processing of his/her data violates the regulations of the GDPR, he/she will have the right to lodge a complaint with the Guarantor Authority for the Protection of Personal Data pursuant to art. 77 of the GDPR.

7. Data Communication and Data Transfer Abroad

The data will be stored and processed at the operational headquarters of the delegated company Different S.p.A. The latter will be able to process the data for the above-mentioned purposes only for the period of the prize competition.

The Owner also reserves the right to transfer the personal data to a third country on the basis of the European Commission's adequacy decisions or on the basis of the adequate guarantees provided for by the regulations in force.

The data will not be disseminated.

8. Data Controller and Data Protection Officer (DPO)

The data will be processed by the Data Processors appointed by the Data Controller.

The Data Controller, pursuant to Article 4.1.7 of the GDPR is Trenord S.r.l., with registered office in 20123 Milan, Piazzale Cadorna n. 14.

The person responsible for the protection of personal data (also "DPO") is attorney-at-law Mr. Yari Mori. In order to exercise your rights under the GDPR referred to in point 6 of this information notice, you may contact the DPO. Any request for information regarding the identification of the Data Processors acting on behalf of the Data Controller must be made to the DPO.

The DPO may be contacted by means of a communication to be sent by post to the registered office of Trenord indicated above or by e-mail to the following e-mail address: privacy@trenord.it.

The complete list of the Data Processors and the categories of data processors are available upon request.